



REPLY TO
ATTENTION OF

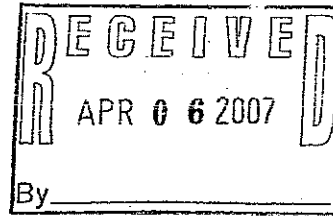
DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, SACRAMENTO
CORPS OF ENGINEERS
1325 J STREET
SACRAMENTO, CALIFORNIA 95814-2922

March 30, 2007

#1

Executive Office

Mr. Jay Punia, General Manager
The Reclamation Board
State of California
3310 El Camino Ave., Rm. LL40
Sacramento, California 95821



Dear Mr. Punia:

The U.S. Army Corps of Engineers has initiated a national levee inventory and assessment program to identify risks to public safety associated with levee systems across the nation. The project's inspection rating is one piece of information that will be recorded in this national database.

Concurrent with the Corps' inventory and assessment initiative, the U.S. Department of Homeland Security's Federal Emergency Management Agency (FEMA) has embarked on a nationwide flood plain mapping program – the Map Modernization (MapMod) Program. FEMA is responsible for administering the National Flood Insurance Program (NFIP), and develops Flood Insurance Rate Maps (FIRMs) to identify areas at risk of flooding, to determine flood insurance rates, and for flood plain management activities. Through the MapMod Program, FEMA will provide the nation with digital flood hazard data and maps that are more reliable, easy to use, and readily available. As part of this process, FEMA is working with other Federal, state, and local agencies to ensure that the most up-to-date information possible is incorporated into this new digital product.

FEMA recognizes that many levees may have changed considerably or deteriorated since the current effective maps were published. As part of the remapping process, FEMA is verifying that all levees recognized as providing protection from the base flood meet the requirements outlined in Title 44 of the Code of Federal Regulations, Section 65.10 (44CFR 65.10). Deficiencies noted in the Corps' inspection could prevent these levees from meeting the operation and maintenance requirements of CFR 65.10 for certification under the NFIP.

Both agencies are working hand-in-hand throughout the inventory/assessment and MapMod initiatives to ensure all relevant information regarding levee conditions is shared among the levee maintaining agency, FEMA, and USACE.

I have attached a list of State of California sponsored projects in the Sacramento and San Joaquin Valley that have been rated as "unacceptable" due to poor maintenance (atch 1). The past periodic inspection and the latest re-inspection of these projects resulted in a project condition rating of "unacceptable". As the project sponsor, you will

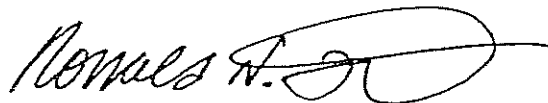
be given a one year maintenance deficiency correction period. You will have one year from the date of this letter to correct the deficiencies noted in the inspection report or this project will be declared "inactive" and become ineligible to receive rehabilitation assistance under PL 84-99 (Rehabilitation and Inspection Program). A summary of the deficiencies can be found in the attached forms (atch 2).

Please submit a plan for the correction of the deficiencies within three months of the date of this letter. The plan must include: a schedule for correcting the noted deficiencies within the one year period; a summary of the interim actions, including an evacuation plan that will be implemented to reduce the flood risk created by the deficiencies; and an outreach plan to notify the public of the deficiencies and planned correction process. If the correction plan is approved by the District Commander, the project shall maintain an "active" status in the Rehabilitation and Inspection Program (RIP) for one year from the date of this letter. If the correction plan is not received within the three month period, the District Commander determines the work cannot reasonably be completed within one year, or at any time the plan is not fully implemented as approved, the project status will be changed to "inactive" and immediately become ineligible for PL 84-99 rehabilitation assistance. After correction of all deficiencies, your office should request a joint inspection of the project for re-evaluation of your ratings. If projects are found to be "acceptable" or "minimally acceptable" after re-inspection, the project will retain its "active" status.

In the event that projects enter into "inactive" status, all deficiencies will need to be corrected and the projects receive at least a "minimally acceptable" inspection rating before the projects' status can be changed to "active". We are providing a copy of this letter to the State of California, congressional members, and FEMA Region 9 as required by our regulations (ER 1130-2-530, paragraph 3-3.g). Regardless of your eligibility to receive rehabilitation assistance, you will remain eligible to receive flood fighting assistance to protect life and property in the event State and local resources are overwhelmed during times of emergency.

The Corps is available to work with you to develop your path forward. Please contact Ms. Meegan Nagy, Acting Chief, Operations-Technical Section at (916) 557-7257 for any questions or concerns.

Sincerely,



Ronald N. Light
Colonel, U.S. Army
District Engineer

Attachments

CF:

Honorable Arnold Schwarzenegger, Governor of California, State Capitol Building,
Sacramento, CA, 95814
Honorable Diane Feinstein, United States Senate, One Post Street, Suite 2450,
San Francisco, CA 94104
Honorable Barbara Boxer, United States Senate, 501 I Street, Suite 7-600,
Sacramento, CA 95814
Honorable Mike Thompson, House of Representatives, 712 Main Street, Suite 101,
Woodland, CA 95695
Honorable Wally Herger, House of Representatives, 55 Independence Circle, Suite 104,
Chico, CA 95973
Honorable Dan Lungren, House of Representatives, 2339 Gold Meadow Way, Suite
220, Gold River, CA 95670
Honorable Ellen O. Tauscher, House of Representatives, 2000 Cadenasso Drive, Suite
A, Fairfield, CA 94533
Honorable Gerald McNerney, House of Representatives, 2222 Grand Canal Blvd., #7
Stockton, CA 95207
Honorable Dennis A. Cardoza, House of Representatives, 137 East Weber Avenue,
Stockton, CA 95202
Honorable Dennis Radanovich, House of Representatives, 1040 E. Herndon, Suite 201,
Fresno, CA 93720
Honorable Edward J. Chavez, Mayor of Stockton, 425 N. El Dorado Street, Stockton,
CA 95202
Honorable Jerry T. Belton, Mayor of Chowchilla, Chowchilla Civic Center, 130 S.
Second Street, Civic Center Plaza, Chowchilla, CA 93610
Honorable Harry T. Price, Mayor of Fairfield, City of Fairfield, City Manager's Office,
1000 Webster Street, Fairfield, California 94533
Honorable Ellie Wooten, Mayor of Merced, 678 W 18th St., Merced, CA 95340
Honorable Bill Harris, Mayor of Marysville, Yuba County, 526 C Street, Marysville, CA 95901
Mr. Bill Goodwin, Chief Administrator, 332 Pine Street, Red Bluff, CA 96080
Levee District 2, Glenn County, 8071 County Road 65, Princeton, CA 95970
Levee District 3, Glenn County, P.O. Box 130, Butte City, CA 95920
RD 150, Yolo County, 37220 South River Road, Clarksburg, CA 95612
RD 307, Yolo County, 52781 South River Road, Clarksburg, CA 95612
RD 349, Sacramento County, P.O. Box 368, Courtland, CA 95615
RD 369, Sacramento County, 13952 Main Street, Locke, CA 95690
RD 501, Solano County, 3554 State Highway 84, Walnut Grove, CA 95690
RD 556, Sacramento County, P.O. Box 1046, Walnut Grove, CA 95690
RD 563, Sacramento County, P.O. Box 470, Walnut Grove, CA 95690-0470
RD 755, Sacramento County, 11275 State Highway 160, Courtland, CA 95615
RD 827, Yolo County, P.O. Box 781, West Sacramento, CA 95691
RD 1600, Yolo County, 429 First Street, Woodland, CA 95695
RD 2098, Solano County, 7178 Yolano Road, Dixon, CA 95620

Service Area 6, Yolo County, Yolo County Service Area 6, Regina Espinoza, 292 West
Beamer Street, Woodland, CA 95695
RD 404, San Joaquin County, P.O. Box 1461, Stockton, Ca 95201
RD 524, San Joaquin County, 7000 South Inland Drive, Stockton, CA 95206
RD 2063, Stanislaus County, 865 Geer Road, Turlock, CA 95380
RD 2064, San Joaquin County, 30000 Garden Avenue, Manteca, CA 95337
Mr. Lester Harder, Deputy Director, DWR, Public Safety & Business Operations,
1416 - 9th Street, Room 1115-19, Sacramento, CA 95814
Mr. Henry Renteria, Director, OES, 3650 Schriever Ave., Mather, CA, 95655
Ms. Nancy Ward, FEMA - District IX, Federal Emergency Management Agency,
1111 Broadway, Suite 1200, Oakland, CA 94607-4052
Solano County Emergency Services, 530 Clay Street, Fairfield, CA 94533
Mr. Keith Swanson, Chief, Flood Project Maintenance Branch, 3310 El Camino Avenue,
Room 110, Sacramento, CA 95821
Mr. Ronald E. Baldwin, Director, Emergency Operations, Courthouse, Room 610, 222 E.
Weber Ave., Stockton, CA 95202
Solano County Emergency Services, 530 Clay Street, Fairfield, CA 94533
Madera County Emergency Services, 14143 Road 28, Madera, CA 93638
Merced County Emergency Services, 735 Martin Luther King Jr. Way, Merced, CA 95340
Tehama County Emergency Services, 502 Oak Street, Red Bluff, CA 96080
Glenn County Emergency Services, 543 West Oak Street, Willows, CA 95992
Yolo County Emergency Services, 35 North Cottonwood Street, Woodland, CA 95695
Sacramento County Emergency Operations Office, 711 G Street, #209A/OES,
Sacramento, CA 95814
Yuba County Emergency Services, 915 8th St. Suite 117, Marysville, CA 95901
Sutter County Emergency Services, P.O. Box 1555, Yuba City, CA 95992

Reclamation Board Sponsored Unsatisfactory Projects

- | | |
|--|--------------------|
| 1. Bear Creek | San Joaquin County |
| 2. Chowchilla River, Ash
And Berenda Sl | Madera County |
| 3. Fairfield Vicinity
Streams | Solano County |
| 4. Littlejohn Creek | San Joaquin County |
| 5. Merced County
Stream Group | Merced County |
| <hr/> | |
| 6. Mormon Slough | San Joaquin County |
| 7. Deer Creek | Tehama County |
| 8. Elder Creek | Tehama County |
| 9. Levee District 2 | Glenn County |
| 10. Levee District 3 | Glenn County |
| 11. RD 150 | Yolo County |
| 12. RD 307 | Yolo County |
| 13. RD 349 | Sacramento County |
| 14. RD 369 | Sacramento County |
| 15. RD 501 | Solano County |
| 16. RD 556 | Sacramento County |
| 17. RD 563 | Sacramento County |
| 18. RD 755 | Sacramento County |
| 19. RD 827 | Yolo County |
| 20. RD 1600 | Yolo County |
| 21. RD 2098 | Solano County |
| 22. Service Area 6 | Yolo County |

- | | |
|------------------------|--------------------|
| 23. City of Marysville | Yuba County |
| 24. Interceptor Canal | Sutter County |
| 25. RD 404 | San Joaquin County |
| 26. RD 524 | San Joaquin County |
| 27. RD 2063 | Stanislaus County |
| 28. RD 2064 | San Joaquin County |

U.S. Department of Homeland Security
1111 Broadway, Suite 1200
Oakland, CA 94607-4052



FEMA

April 17, 2007

RECEIVED

APR 19 2007

Mr. Jay Punia, General Manager
The Reclamation Board
State of California
3310 El Camino Ave., Rm. LL40
Sacramento, California 95821

Dear Mr. Punia:

This letter is in regard to the RD 501 levees that are accredited on the effective Flood Insurance Rate Map (FIRM) and in the effective Flood Insurance Study (FIS) report for the unincorporated areas of Solano County. These levees are identified on an enclosure to this letter. The U.S. Department of Homeland Security, Federal Emergency Management Agency (FEMA), is in the process of producing a countywide FIS report and Digital Flood Insurance Rate Map (DFIRM) for Solano County, CA. This effort is being undertaken as part of FEMA's Flood Map Modernization Program.

Flood hazard information presented on the effective FIRM and in the FIS report is based, in some areas, on flood protection provided by the levees identified on the enclosure. Based on the information available and on the mapping standards of the National Flood Insurance Program (NFIP) at the time that the FIS was performed, FEMA accredited the levees with providing protection from the flood that has a 1-percent-chance of being equaled or exceeded in any given year. The 1-percent-annual-chance flood also is referred to as the base flood.

For FEMA to continue to accredit the identified levees with providing protection from the base flood, the levees must meet the criteria of the Code of Federal Regulations, Title 44, Section 65.10 (44 CFR 65.10), titled "Mapping of Areas Protected by Levee Systems" (copy enclosed). In accordance with 44 CFR 65.10(a), it is the responsibility of the community or other party seeking recognition of a levee system, to provide the data defined and outlined within the regulation. Specifically, the design and construction data provided must be certified by a registered professional engineer or by a Federal agency with responsibility for levee design.

FEMA has been informed by the U.S. Army Corps of Engineers (USACE) that the levees identified as "May be PAL C-2 Eligible" in the Levee Status column of the attached Levee Status Table have received an unacceptable maintenance level rating. A copy of the letter sent to you, Gov. Schwarzenegger, Solano County, and FEMA Region IX by the USACE is enclosed for your reference.

The USACE has issued supplemental guidance that establishes a 1-year correction period for maintenance-deficient levees. This 1-year correction period will provide levee owners with the opportunity to remedy levee maintenance deficiencies before the levee is considered inactive in the USACE Rehabilitation and Inspection Program. In response to the supplemental guidance from USACE, FEMA will also provide a 1-year correction period for all maintenance-deficient levees. The levees identified as "May be PAL C-2 Eligible" in the Levee Status column of the attached Levee Status Table qualify for the 1-year correction period.

USACE has afforded you the 1-year correction period. FEMA will move forward with the current flood hazard study as if the areas landward of the levee are located in a Special Flood Hazard Area (SFHA), the area subject to inundation by the base flood. However, FEMA will delay issuance of the Letter of Final Determination (LFD) and effective DFIRM until the 1-year correction period has elapsed.

For FEMA to remove the SFHA landward of the levee, the following requirements must be met within the 1-year correction period:

- All the requirements contained in 44 CFR 65.10; or
- Submittal of the entire Provisionally Accredited Levee (PAL) agreement signed by the levee owner and all impacted communities stating that the PAL designation is warranted because the levee meets the requirements of 44 CFR 65.10.

Once the 1-year correction period has expired, USACE, in coordination with FEMA, will assess the adequacy of any submitted data and determine whether any mapping revisions are necessary. If no data have been submitted within the 1-year correction period, or if the submitted data are determined inadequate, FEMA will issue the LFD and effective DFIRM to show the areas landward of a maintenance deficient levee as located in an SFHA. However, if all of the requirements for 44 CFR 65.10 or the entire PAL application is submitted before the 1-year correction period has elapsed, then FEMA will show the levee on the newly effective DFIRM as accredited and remove the proposed SFHA, as applicable.

FEMA understands that it may take time to acquire and/or assemble the documentation necessary to fully comply with 44 CFR 65.10. Therefore, FEMA has incorporated a process into the schedule of Flood Map Modernization that, if needed, will provide Solano County with additional time to submit all of the necessary documentation. Initiation of this process can take place only if the levee owner and a representative of each impacted community sign and return the enclosed agreement to the FEMA Region IX office within one year of the date of the USACE letter (before March 30, 2008). This offer is being made only for the levees that are identified as "May be PAL C-2 Eligible" in the Levee Status column of the attached Levee Status Table.

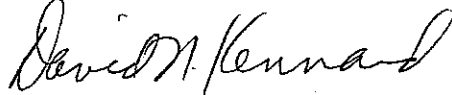
Completion and submittal of the agreement, will serve as an official request that FEMA label the levee as a Provisionally Accredited Levee (PAL) on the DFIRM and will serve as agreement that, to the best knowledge, the levee meets the criteria of 44 CFR 65.10. It is the responsibility of the levee owner to submit the data required by 44 CFR 65.10 before FEMA can accredit the levee as providing protection from the base flood. The completed agreement must be submitted before March 30, 2008, for the levee to receive the PAL designation.

By endorsing the enclosed agreement, you state that all the necessary documentation will be provided within 2 years of the end of the 1-year correction period to comply with 44 CFR 65.10; that is before March 30, 2010. If you are unable to submit all the documentation necessary to meet the criteria of 44 CFR 65.10 before this date, FEMA will initiate a map revision to redesignate certain areas on the landward side of the levee as floodprone. Upon receipt of the 44 CFR 65.10 submittal, we will review the data and determine whether the levee will continue to be accredited with providing protection from the base flood. The affected communities that do not own and/or maintain the "May be PAL C-2 Eligible" levee(s) in question are not responsible for submitting data necessary for 44 CFR 65.10 compliance.

Levees will be labeled as PALs during the 24-month period to convey to map users that levee certification verification is underway. FEMA recommends that the levee owner and the impacted communities implement outreach efforts to inform affected property owners that an assessment of the levee is underway. FEMA also encourages the purchase of flood insurance, even though coverage is not federally required for the areas landward of the levee.

If you have additional questions regarding the specific submittal requirements, please contact Eric Simmons, Map Modernization Regional Engineer, of my staff, either by telephone at (510) 627-7029 or by facsimile at (510) 627-7147. We look forward to working with you and community officials to address this important matter. If there is anything we can do to facilitate the submittal process, please let us know.

Sincerely,


for Sally Ziolkowski, Director
Mitigation Division
FEMA Region IX

Enclosures:

- Title 44 of the Code of Federal Regulations (CFR), Section 65.10 (44 CFR 65.10)
- Requirements of 44 CFR Section 65.10: Mapping of Areas Protected by Levee Systems
- Letter of Agreement and Request for Provisionally Accredited Levee (PAL) Designation and Agreement to Provide Adequate Compliance With the Code of Federal Regulations, Title 44, Section 65.10 (44 CFR 65.10)
- Levee Status Map
- Levee Status Table

cc: Mr. Michael Reagan, Chairman Solano County Board of Supervisors
Mr. David Cliche, Solano County Floodplain Administrator
Mr. Ricardo Pineda, CA DWR, State NFIP Coordinator
Ms. Judy Soutiere, USACE Sacramento District
Senator Feinstein's District Office
Senator Boxer's District Office
Representative Lungren's District Office

RECEIVED

MAY 10 2007

**FEMA**

May 4, 2007

Mr. Chris Neudeck
Kjeldsen, Sinnick & Neudeck, Inc.
711 North Pershing Avenue
Stockton, California 95201-0844

Dear Mr. Neudeck:

This letter provides an update on the Federal Emergency Management Agency (FEMA) review of the levee system for Reclamation District No. 17 (RD 17). The following information submitted by RD 17 has been received and reviewed by FEMA's contractor, Nolte Associates, Inc.

1. Volume 1 Binder with CD- Correspondence, Research & Manuals;
2. Volume 2 Binder – Correspondence, Research & Manuals (Continued);
3. Volume 3 Binder – Geotechnical and Specifications; and
4. Volume 4 Binder – Plans.

Title 44 of the Code of Federal Regulations, Section 65.10 (44 CFR 65.10) provides the minimum design, operation, and maintenance standards that levee systems must meet and continue to meet in order to be recognized as providing protection from the base (1% annual chance) flood on National Flood Insurance Program (NFIP) maps. To ensure that the levee system for RD 17 continues to meet the standards set forth in 44 CFR 65.10 we request the following additional information:

1. Copies of maintenance and inspection reports and written verification that any deficiencies that were noted during the maintenance inspections have been corrected.
2. Written commentary on the performance of the levee system in any actual flood event(s). This assessment should include as much of the following information as is available:
 1. Date(s) and magnitude of the flood events(s)
 2. Whether or not the levee was overtopped, breached, or otherwise failed.
 3. Whether or not the interior drainage and closure systems were activated and how they performed.
 4. Extent and depth of interior ponding behind the levee
 5. Extent and magnitude of any under seepage
 6. Extent and magnitude of erosion, sedimentation, or structural damage to the system.
 7. Any other pertinent information relevant to the levee's performance.

3. Geotechnical information submitted in accordance with 44 CFR 65.10 (b)(4) evaluating expected seepage during loading conditions associated with the base flood demonstrating that seepage through the levee foundation will not jeopardize stability. Special consideration should be given to the U.S. Army Corps of Engineers Technical Letter 11110-2-569 Design Guidance for levee Underseepage (dated May 1, 2005)

Please do not hesitate to contact me at (510) 627-7129 if you have any questions on flood hazard mapping.

Sincerely,



Kathleen Schaefer, P.E., CFM
FEMA Region IX
Mitigation Division

cc: Thomas Flinn, San Joaquin County Floodplain Administrator
Jay Punia, General Manager of The Reclamation Board
Judy Soutiere, U.S. Army Corps of Engineers Sacramento District
Ricardo Pineda, State NFIP Coordinator
Jack Eldridge, Michael Baker Jr., Inc.
Scott Berkebile, Nolte Assoc, Inc.



SOLANO COUNTY
Department of Resource Management
Public Works Engineering
675 Texas Street, Suite 5500
Fairfield, CA 94533
www.solanocounty.com

RECEIVED

MAY 11 2007

#4

Telephone No.: (707) 784-6060
Fax No.: (707) 784-2894

Birgitta Corsello, Director
Cliff Covey, Assistant Director

May 9, 2007

Mr. Jay Punia
General Manager
State of California Reclamation Board
3310 El Camino Avenue, RM 1140
Sacramento, CA 95821

CERTIFIED MAIL
7006 2760 0004 3643 5911

Re: PAL Agreement for FEMA

Dear Levee Owner:

FEMA sent out notification to all levee owners explaining the PAL agreements and requesting that you respond by April 10th 2007. After they received the data and compiled it they sent out letters to all the local agencies detailing the Flood Map Modernization Program on April 17th 2007. This letter marked the beginning of the 90 period in which levee owners may enter into the Provisionally Accredited Levee (PAL) agreement with FEMA.

In order for the levee to be shown on the Flood Insurance Rate Map as protecting against the 100 year flood the levee must meet the criteria laid out in the Code of Federal Regulations, Title 44, Section 65.10 (44 CFR65.10). If you have the certification presently, then you can apply for full accreditation without entering into the PAL agreement. If you do not have the certification necessary and want to have the levee certified then you may enter into the PAL agreement which states that, in the next two years, you will obtain certification. If this does not occur your levee will not be shown on the FEMA Flood Insurance Rate Map and flood insurance will be required for everybody in the flood plain behind the levee.

Building & Safety
David Cliche,
Chief Building
Official

Planning Services
Mike Yankovich
Program Manager

Environmental
Health
Terry Schmidtbauer
Program Manager

Administrative
Services
Daniel Bellem
Staff Analyst

Public Works-
Engineering
Paul Wiese
Engineering Manager

Public Works-
Operations
Steve Hilas
Operations Manager

If you intend on entering the PAL agreement then you and the Community CEO must sign the agreement. In order to receive the Community CEO's signature board approval is required and your signed PAL Agreement Form must be received no later then May 21st 2007 at:

Solano County, Resource Management
Attn: David Cliché, Flood Plain Administrator
675 Texas Street, Suite 5500
Fairfield, Ca 94533

If you do not intend on entering the PAL agreement then please respond with a phone call notifying me of this fact.

If you have any questions or need additional information, please contact me at (707) 784-4705, or email me at dwcliche@solanocounty.com.

Sincerely,



David Cliche
Building Official

Cc Michael Reagan, Solano County Chairman
Cc Birgitta Corsello, Director of Resource Management

PROOF OF SERVICE BY MAIL

I am over the age of eighteen (18) and not a party to this cause. I am a resident of or employed in the county where the mailing occurred. My residence or business address is: **Solano County Department of Resource Management, 675 Texas Street, Suite 5500, Fairfield, CA 94533.**

I served the **PAL Agreement for FEMA letter** regarding **the beginning of the 90 day period** by enclosing a true copy in a sealed envelope addressed to each person whose name and address is given below, as shown on the envelope, and placing the envelope for collection and mailing following ordinary business practice of the County of Solano. I am readily familiar with the County of Solano's practice of collection and processing of correspondence for mailing with the United States Postal Service. The correspondence would be deposited with the United States Postal Service that same day in the ordinary course of business.

(1) **May 10, 2007.**

(2) **Place of business where the correspondence was placed for deposit in the United States Postal Service Solano County Mail Collection Box for the Department of Resource Management, 675 Texas Street, Suite 5500, Fairfield, CA. 94533**

(3) Name and address of each person to whom document was mailed:

Peter J. Wright, PE Assistant Civil Engineer, 1000 Webster Street, Fairfield, CA 94533

Brian Dolan, Director Development Services, City of Vallejo, 555 Santa Clara Street, Vallejo, CA 94590

Rudolf Ohiemutz, District Engineer, 450 Ryder Street, Vallejo, CA 94590

Reclamation District 501, District Office, 3554 State Highway 84, Walnut Grove, CA 95690

William (Bill) Miller, President, Reclamation District 2104, 6302 Morado Lane, Stockton, CA 95205

Keith Swanson, California Department of Water Resources PO Box 219000, Sacramento, CA 95821

Reclamation District 2060, District Office, 1143 Crane Street, Suite 200, Menlo Park, CA 94025

Lee Laurence, Reclamation District 1667, Resources Mgt Projects Officer,

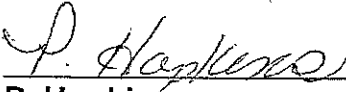
2800 Cottage Way, Sacramento, CA 95825-1898

Reclamation District 536, District Office, PO Box 785, Rio Vista, CA 94571

Jay Punia, General Manager, State of California Reclamation Board, 3310 El Camino Avenue, Room 1140, Sacramento, CA 95821

Thomas L. Pate, Solano County Water Agency, 6040 Vaca Station Road, Elmira, CA 95625

- (4) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration is executed on **April 20, 2007**, at **Department of Resource Management, Administrative Services Division, 675 Texas Street, Suite 5500, Fairfield, CA 94533.**



P. Hopkins

U.S. Department of Homeland Security
1111 Broadway, Suite 1200
Oakland, CA 94607-4052



FEMA

May 16, 2007

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Tony Barba, Chairman
Kings County Board of Supervisors
1400 W. Lacey Boulevard
Hanford, CA 93230

Dear Chairman Barba:

This letter is in regard to the levees that are accredited on the effective Flood Insurance Rate Map (FIRM) and in the effective Flood Insurance Study (FIS) report for the unincorporated areas of Kings County. These levees are identified on an enclosure to this letter. The U.S. Department of Homeland Security, Federal Emergency Management Agency (FEMA), is in the process of producing a countywide FIS report and Digital Flood Insurance Rate Map (DFIRM) for Kings County, CA. This effort is being undertaken as part of FEMA's Flood Map Modernization Program.

Flood hazard information presented on the effective FIRM and in the FIS report is based, in some areas, on flood protection provided by the levees identified on the enclosure. Based on the information available and on the mapping standards of the National Flood Insurance Program (NFIP) at the time that the FIS was performed, FEMA accredited the levees with providing protection from the flood that has a 1-percent-chance of being equaled or exceeded in any given year. The 1-percent-annual-chance flood also is referred to as the base flood.

For FEMA to continue to accredit the identified levees with providing protection from the base flood, the levees must meet the criteria of the Code of Federal Regulations, Title 44, Section 65.10 (44 CFR 65.10), titled "Mapping of Areas Protected by Levee Systems" (copy enclosed). In accordance with 44 CFR 65.10(a), it is the responsibility of the community or other party seeking recognition of a levee system, to provide the data defined and outlined within the regulation. Specifically, the design and construction data provided must be certified by a registered professional engineer or by a Federal agency with responsibility for levee design.

FEMA understands that it may take time to acquire and/or assemble the documentation necessary to fully comply with 44 CFR 65.10. Therefore, FEMA has incorporated a process into the schedule of Flood Map Modernization that, if needed, will provide Kings County with additional time to submit all the necessary documentation. Initiation of this process can take place only if the levee owner and a representative of each impacted community sign and return the enclosed agreement to the FEMA Region IX office within 90 days of the date of this letter (before August 15, 2007). This offer is being made only for the levees that are identified as "May be PAL A Eligible" or "May be PAL B Eligible" in the Levee Status column of the attached Levee Status Table.

Completion and submittal of the agreement, will serve as an official request that FEMA label the levee as a Provisionally Accredited Levee (PAL) on the DFIRM and will serve as agreement that, to the best of your knowledge, the levee meets the criteria of 44 CFR 65.10. It is the responsibility of the levee owner to submit the data required by 44 CFR 65.10 before FEMA can accredit the levee as providing protection from the base flood. The completed package must be submitted to the FEMA Region IX office before August 15, 2007 for the levee to receive the PAL designation. Please note that a levee that has maintenance deficiencies is not eligible for PAL consideration.

By endorsing the enclosed agreement, you state that all the necessary documentation will be provided within 2-years to comply with 44 CFR 65.10; that is before August 15, 2009. If you are unable to submit all the documentation necessary to meet the criteria of 44 CFR 65.10 before this date, FEMA will initiate a map revision to redesignate certain areas on the landward side of the levee as floodprone.

Levees will be labeled as PALs during the 24-month period to convey to map users that levee certification verification is underway. FEMA recommends that the levee owner and the impacted communities implement outreach efforts to inform affected property owners that an assessment of the levee is underway. FEMA also encourages the purchase of flood insurance, even though coverage is not federally required for the areas landward of the accredited levee.

If the documentation necessary to fully comply with 44 CFR 65.10, including an existing operation and maintenance plan and record of on-site inspection, is readily available, please submit the data to this office. Upon receipt of your submittal, FEMA will review the data and determine whether the levee will continue to be accredited with providing protection from the base flood.

The levees identified as "May be PAL B Eligible" in the Levee Status column of the attached Levee Status Table have received an acceptable maintenance level rating from the U. S. Army Corps of Engineers (USACE) in a recent inspection review. The levees identified as "May be PAL A Eligible" in the Levee Status column of the attached Levee Status Table are not in the USACE program and, therefore, do not have an approved maintenance review for FEMA purposes. If the only grounds for a "May be PAL A Eligible" levee not currently meeting the 44 CFR 65.10 criteria or PAL requirements are **maintenance issues**, then the FEMA Region IX office must be contacted by letter to bring attention to the matter before the end of this 90-day period to submit the enclosed PAL agreement. If you notify FEMA that the levee has known maintenance deficiencies, then a 1-year correction period can be provided to remedy these deficiencies. This 1-year correction period would begin on August 15, 2007, if you notify FEMA within 90 days of the date of this letter. During the 1-year correction period, FEMA will move forward with the current flood hazard mapping project as if the areas landward of the levee is to be located in a Special Flood Hazard Area (SFHA); the mapped area subject to inundation by the base flood. However, FEMA will delay issuance of the Letter of Final Determination (LFD) and effective DFIRM until the 1-year correction period has elapsed.

For FEMA to remove the proposed SFHA landward of the levee, the following requirements must be met within the 1-year correction period:

- All the criteria contained in 44 CFR 65.10 submitted to FEMA, or
- Submittal of the entire PAL application, including the following documentation:
 - An agreement signed by the community and/or levee owner stating that the PAL designation is warranted because the levee meets the requirements of 44 CFR 65.10;

- A copy of the adopted operation and maintenance plan for the levee; and
- Records of levee maintenance and operation, as well as tests of the mechanized interior drainage systems, if applicable.

Once the 1-year correction period has expired, FEMA will assess any submitted data and determine whether any mapping revisions are necessary. If no data have been submitted within the 1-year correction period, or if the submitted data are determined inadequate, FEMA will issue the LFD and effective DFIRM to show the areas landward of a maintenance deficient levee as located in a SFHA. However, if all of the criteria of 44 CFR 65.10 or the entire PAL application is submitted before the 1-year correction period has elapsed, then FEMA will show the levee on the newly effective DFIRM as accredited or provisionally accredited, as applicable.

The Kings River Conservation District levees that are identified as "May be PAL C2 Eligible" in the Levee Status column of the attached Levee Status Table have **not** received an acceptable maintenance level rating from the U. S. Army Corps of Engineers (USACE) in a recent inspection review. These "May be PAL C2 Eligible" levees cannot be considered for a PAL agreement unless the maintenance deficiencies are corrected within a one year time frame established by USACE. A separate letter will be sent to the owners of these levees regarding this issue.

If you have additional questions regarding the specific submittal requirements, please contact Eric Simmons, Map Modernization Regional Engineer, of my staff, either by telephone at (510) 627-7029 or by facsimile at (510) 627-7147. We look forward to working with you and community officials to address this important matter. If there is anything we can do to facilitate the submittal process, please let us know.

Sincerely,



Sally Ziolkowski, Director
Mitigation Division
FEMA Region IX

Enclosures:

- Title 44 of the Code of Federal Regulations (CFR), Section 65.10 (44 CFR 65.10)
- Requirements of 44 CFR Section 65.10: Mapping of Areas Protected by Levee Systems
- Letter of Agreement and Request for Provisionally Accredited Levee (PAL) Designation and Agreement to Provide Adequate Compliance With the Code of Federal Regulations, Title 44, Section 65.10 (44 CFR 65.10)
- Levee Status Map
- Levee Status Table

cc: Bill Zumwalt, Kings County, Floodplain
Administrator
Rick Hoelzel, Kings River Conservation
District, Manager of Water Resources
WH Wilbur, Reclamation District 825
Walter Bricker, Reclamation District 1618
and Reclamation District 2071
David Wlaschin, City of Lemoor, Public
Works Director

Nakul Verma, City of Lemoor, Floodplain
Administrator
Ricardo Pineda, CA DWR, NFIP State
Coordinator
Judy Soutiere, USACE, Sacramento District
Senator Feinstein State Office
Senator Boxer State Office
Representative Costa District Office

U.S. Department of Homeland Security
1111 Broadway, Suite 1200
Oakland, CA 94607-4052



FEMA

May 24, 2007

Mr. Jay Punia, General Manager
The Reclamation Board, State of California
3310 El Camino Ave., Rm. LL40
Sacramento, California 95821

RECEIVED

MAY 24 2007

Dear Mr. Punia:

This letter is in regard to the levees that are identified as "May be PAL C-2 Eligible" in the Levee Status column of the attached Levee Status Tables. These levees are accredited on the effective Flood Insurance Rate Map (FIRM) and in the effective Flood Insurance Study (FIS) report for the unincorporated areas of San Joaquin County and the City of Stockton. The U.S. Department of Homeland Security, Federal Emergency Management Agency (FEMA), is in the process of producing a countywide FIS report and Digital Flood Insurance Rate Map (DFIRM) for San Joaquin County, CA. This effort is being undertaken as part of FEMA's Flood Map Modernization Program.

Flood hazard information presented on the effective FIRM and in the FIS report is based, in some areas, on flood protection provided by the levees identified on the enclosure. Based on the information available and on the mapping standards of the National Flood Insurance Program (NFIP) at the time that the FIS was performed, FEMA accredited the levees with providing protection from the flood that has a 1-percent-chance of being equaled or exceeded in any given year. The 1-percent-annual-chance flood also is referred to as the base flood.

For FEMA to continue to accredit the identified levees with providing protection from the base flood, the levees must meet the criteria of the Code of Federal Regulations, Title 44, Section 65.10 (44 CFR 65.10), titled "Mapping of Areas Protected by Levee Systems" (copy enclosed). In accordance with 44 CFR 65.10(a), it is the responsibility of the community or other party seeking recognition of a levee system, to provide the data defined and outlined within the regulation. Specifically, the design and construction data provided must be certified by a registered professional engineer or by a Federal agency with responsibility for levee design.

FEMA has been informed by the U.S. Army Corps of Engineers (USACE) that the levees identified as "May be PAL C-2 Eligible" in the Levee Status column of the attached Levee Status Table have received an unacceptable maintenance level rating. A copy of the March 30, 2007 letter sent to you, Gov. Schwarzenegger, San Joaquin County, and FEMA Region IX by the USACE is enclosed for your reference.

The USACE has issued supplemental guidance that establishes a 1-year correction period for maintenance-deficient levees. This 1-year correction period will provide levee owners with the opportunity to remedy levee maintenance deficiencies before the levee is considered inactive in the USACE Rehabilitation and Inspection Program. In response to the supplemental guidance from USACE, FEMA will also provide a 1-year correction period for all maintenance-deficient levees. The levees identified as "May be PAL C-2 Eligible" in the Levee Status column of the attached Levee Status Table qualify for the 1-year correction period.

USACE has afforded you the 1-year correction period. FEMA will move forward with the current flood hazard study as if the areas landward of the levee are located in a Special Flood Hazard Area (SFHA), the area subject to inundation by the base flood. However, FEMA will delay issuance of the Letter of Final Determination (LFD) and effective DFIRM until the 1-year correction period has elapsed.

For FEMA to remove the SFHA landward of the levee, the following requirements must be met within the 1-year correction period:

- All the requirements contained in 44 CFR 65.10; or
- Submittal of the entire Provisionally Accredited Levee (PAL) agreement signed by the levee owner and all impacted communities stating that the PAL designation is warranted because the levee meets the requirements of 44 CFR 65.10.

Once the 1-year correction period has expired, USACE, in coordination with FEMA, will assess the adequacy of any submitted data and determine whether any mapping revisions are necessary. If no data have been submitted within the 1-year correction period, or if the submitted data are determined inadequate, FEMA will issue the LFD and effective DFIRM to show the areas landward of a maintenance deficient levee as located in an SFHA. However, if all of the requirements for 44 CFR 65.10 or the entire PAL application is submitted before the 1-year correction period has elapsed, then FEMA will show the levee on the newly effective DFIRM as accredited and remove the proposed SFHA, as applicable.

FEMA understands that it may take time to acquire and/or assemble the documentation necessary to fully comply with 44 CFR 65.10. Therefore, FEMA has incorporated a process into the schedule of Flood Map Modernization that, if needed, will provide San Joaquin County with additional time to submit all of the necessary documentation. Initiation of this process can take place only if the levee owner and a representative of each impacted community sign and return the enclosed agreement to the FEMA Region IX office within one year of the date of the USACE letter (before March 30, 2008). This offer is being made only for the levees that are identified as "May be PAL C-2 Eligible" in the Levee Status column of the attached Levee Status Table.

Completion and submittal of the agreement, will serve as an official request that FEMA label the levee as a Provisionally Accredited Levee (PAL) on the DFIRM and will serve as agreement that, to the best knowledge, the levee meets the criteria of 44 CFR 65.10. It is the responsibility of the levee owner to submit the data required by 44 CFR 65.10 before FEMA can accredit the levee as providing protection from the base flood. The completed agreement must be submitted before March 30, 2008, for the levee to receive the PAL designation.

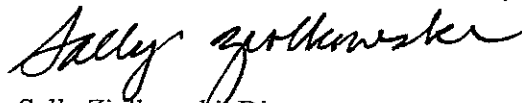
By endorsing the enclosed agreement, you state that all the necessary documentation will be provided within 2 years of the end of the 1-year correction period to comply with 44 CFR 65.10; that is before March 30, 2010. If you are unable to submit all the documentation necessary to meet the criteria of 44 CFR 65.10 before this date, FEMA will initiate a map revision to redesignate certain areas on the landward side of the levee as floodprone. Upon receipt of the 44 CFR 65.10 submittal, we will review the data and determine whether the levee will continue to be accredited with providing protection from the base flood. The affected communities that do not own and/or maintain the "May be PAL C-2 Eligible" levee(s) in question are not responsible for submitting data necessary for 44 CFR 65.10 compliance.

Levees will be labeled as PALs during the 24-month period to convey to map users that levee certification verification is underway. FEMA recommends that the levee owner and the impacted

communities implement outreach efforts to inform affected property owners that an assessment of the levee is underway. FEMA also encourages the purchase of flood insurance, even though coverage is not federally required for the areas landward of the levee.

If you have additional questions regarding the specific submittal requirements, please contact Kathy Schaefer, Map Modernization Regional Engineer, of my staff, either by telephone at (510) 627-7129 or by facsimile at (510) 627-7147. We look forward to working with you and community officials to address this important matter. If there is anything we can do to facilitate the submittal process, please let us know.

Sincerely,



Sally Ziolkowski, Director
Mitigation Division
FEMA Region IX

Enclosures:

- Title 44 of the Code of Federal Regulations (CFR), Section 65.10 (44 CFR 65.10)
- Requirements of 44 CFR Section 65.10: Mapping of Areas Protected by Levee Systems
- Letter of Agreement and Request for Provisionally Accredited Levee (PAL) Designation and Agreement to Provide Adequate Compliance With the Code of Federal Regulations, Title 44, Section 65.10 (44 CFR 65.10)
- San Joaquin County Levee Status Map
- San Joaquin County Levee Status Table
- Stockton Levee Status Map
- Stockton Levee Status Table
- Letter Dated March 30, 2007 from Colonel Light to Mr. Punia

cc: Charles Kelly, San Joaquin County, Floodplain Administrator
Roger Churchwell, San Joaquin County Flood Control and Water Conservation District,
Senior Civil Engineer
James Giottonini, San Joaquin Area Flood Control Agency, Executive Director
Dante John Nomellini, Reclamation District 404
Donald Machado, Reclamation District 2064
Ricardo Pineda, CA DWR, NFIP State Coordinator
Judy Soutiere, USACE, Sacramento District
Senator Feinstein State Office
Senator Boxer State Office
Representative McNerney District Office
Representative Cardoza District Office

U.S. Department of Homeland Security
1111 Broadway, Suite 1200
Oakland, CA 94607-4052



FEMA

May 24, 2007

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

The Honorable Edward J. Chavez, Mayor
City of Stockton
222 East Weber Avenue
Stockton, CA 95202

Dear Mayor Chavez:

This letter is in regard to the levees that are accredited on the effective Flood Insurance Rate Map (FIRM) and in the effective Flood Insurance Study (FIS) report for the City of Stockton. These levees are identified on an enclosure to this letter. The U.S. Department of Homeland Security, Federal Emergency Management Agency (FEMA), is in the process of producing a countywide FIS report and Digital Flood Insurance Rate Map (DFIRM) for San Joaquin County, CA. This effort is being undertaken as part of FEMA's Flood Map Modernization Program.

Flood hazard information presented on the effective FIRM and in the FIS report is based, in some areas, on flood protection provided by the levees identified on the enclosure. Based on the information available and on the mapping standards of the National Flood Insurance Program (NFIP) at the time that the FIS was performed, FEMA accredited the levees with providing protection from the flood that has a 1-percent-chance of being equaled or exceeded in any given year. The 1-percent-annual-chance flood also is referred to as the base flood.

For FEMA to continue to accredit the identified levees with providing protection from the base flood, the levees must meet the criteria of the Code of Federal Regulations, Title 44, Section 65.10 (44 CFR 65.10), titled "Mapping of Areas Protected by Levee Systems" (copy enclosed). In accordance with 44 CFR 65.10(a), it is the responsibility of the community or other party seeking recognition of a levee system, to provide the data defined and outlined within the regulation. Specifically, the design and construction data provided must be certified by a registered professional engineer or by a Federal agency with responsibility for levee design.

FEMA understands that it may take time to acquire and/or assemble the documentation necessary to fully comply with 44 CFR 65.10. Therefore, FEMA has incorporated a process into the schedule of Flood Map Modernization that, if needed, will provide the City of Stockton with additional time to submit all the necessary documentation. Initiation of this process can take place only if the levee owner and a representative of each impacted community sign and return the enclosed agreement to the FEMA Region IX office within 90 days of the date of this letter (before August 23, 2007). This offer is being made only for the levees that are identified as "May be PAL A Eligible" or "May be PAL B Eligible" in the Levee Status column of the attached Levee Status Table.

Completion and submittal of the agreement, will serve as an official request that FEMA label the levee as a Provisionally Accredited Levee (PAL) on the DFIRM and will serve as agreement that, to the best of your knowledge, the levee meets the criteria of 44 CFR 65.10. It is the responsibility of the levee owner to submit the data required by 44 CFR 65.10 before FEMA can accredit the levee as providing protection from the base flood. The completed package must be submitted to the FEMA Region IX office before August 23, 2007 for the levee to receive the PAL designation. Please note that a levee that has maintenance deficiencies is not eligible for PAL consideration.

By endorsing the enclosed agreement, you state that all the necessary documentation will be provided within 2-years to comply with 44 CFR 65.10; that is before August 23, 2009. If you are unable to submit all the documentation necessary to meet the criteria of 44 CFR 65.10 before this date, FEMA will initiate a map revision to redesignate certain areas on the landward side of the levee as floodprone.

Levees will be labeled as PALs during the 24-month period to convey to map users that levee certification verification is underway. FEMA recommends that the levee owner and the impacted communities implement outreach efforts to inform affected property owners that an assessment of the levee is underway. FEMA also encourages the purchase of flood insurance, even though coverage is not federally required for the areas landward of the accredited levee.

If the documentation necessary to fully comply with 44 CFR 65.10, including an existing operation and maintenance plan and record of on-site inspection, is readily available, please submit the data to this office. Upon receipt of your submittal, FEMA will review the data and determine whether the levee will continue to be accredited with providing protection from the base flood.

The levees identified as "May be PAL B Eligible" in the Levee Status column of the attached Levee Status Table have received an acceptable maintenance level rating from the U. S. Army Corps of Engineers (USACE) in a recent inspection review. The levees identified as "May be PAL A Eligible" in the Levee Status column of the attached Levee Status Table are not in the USACE program and, therefore, do not have an approved maintenance review for FEMA purposes. If the only grounds for a "May be PAL A Eligible" levee not currently meeting the 44 CFR 65.10 criteria or PAL requirements are **maintenance issues**, then the FEMA Region IX office must be contacted by letter to bring attention to the matter before the end of this 90-day period to submit the enclosed PAL agreement. If you notify FEMA that the levee has known maintenance deficiencies, then a 1-year correction period can be provided to remedy these deficiencies. This 1-year correction period would begin on August 23, 2007, if you notify FEMA within 90 days of the date of this letter. During the 1-year correction period, FEMA will move forward with the current flood hazard mapping project as if the areas landward of the levee is to be located in a Special Flood Hazard Area (SFHA); the mapped area subject to inundation by the base flood. However, FEMA will delay issuance of the Letter of Final Determination (LFD) and effective DFIRM until the 1-year correction period has elapsed.

For FEMA to remove the proposed SFHA landward of the levee, the following requirements must be met within the 1-year correction period:

- All the criteria contained in 44 CFR 65.10 submitted to FEMA, or
- Submittal of the entire PAL application, including the following documentation:
 - An agreement signed by the community and/or levee owner stating that the PAL designation is warranted because the levee meets the requirements of 44 CFR 65.10;
 - A copy of the adopted operation and maintenance plan for the levee; and

- o Records of levee maintenance and operation, as well as tests of the mechanized interior drainage systems, if applicable.

Once the 1-year correction period has expired, FEMA will assess any submitted data and determine whether any mapping revisions are necessary. If no data have been submitted within the 1-year correction period, or if the submitted data are determined inadequate, FEMA will issue the LFD and effective DFIRM to show the areas landward of a maintenance deficient levee as located in a SFHA. However, if all of the criteria of 44 CFR 65.10 or the entire PAL application is submitted before the 1-year correction period has elapsed, then FEMA will show the levee on the newly effective DFIRM as accredited or provisionally accredited, as applicable.

The levees that are identified as "May be PAL C-2 Eligible" in the Levee Status column of the attached Levee Status Table have not received an acceptable maintenance level rating from the U. S. Army Corps of Engineers (USACE) in a recent inspection review. These "May be PAL C-2 Eligible" levees cannot be considered for a PAL agreement unless the maintenance deficiencies are corrected within a one year time frame established by USACE. A separate letter will be sent to the owners of these levees regarding this issue.

If you have additional questions regarding the specific submittal requirements, please contact Kathy Schaefer, Map Modernization Regional Engineer, of my staff, either by telephone at (510) 627-7129 or by facsimile at (510) 627-7147. We look forward to working with you and community officials to address this important matter. If there is anything we can do to facilitate the submittal process, please let us know.

Sincerely,



Sally Ziolkowski, Director
Mitigation Division
FEMA Region IX

Enclosures:

- Title 44 of the Code of Federal Regulations (CFR), Section 65.10 (44 CFR 65.10)
- Requirements of 44 CFR Section 65.10: Mapping of Areas Protected by Levee Systems
- Letter of Agreement and Request for Provisionally Accredited Levee (PAL) Designation and Agreement to Provide Adequate Compliance With the Code of Federal Regulations, Title 44, Section 65.10 (44 CFR 65.10)
- Levee Status Map
- Levee Status Table

cc: Gordon Palmer, Jr., City of Stockton,
City Manager
James Giottonini, City of Stockton,
Floodplain Administrator; and San Joaquin Area
Flood Control Agency, Executive Director
Charles Davis, NRCS, State Conservation
Engineer
Roger Churchwell, San Joaquin County
Flood Control and Water Conservation
District, Senior Civil Engineer
Charles Kelly, San Joaquin County,
Floodplain Administrator
Gordon Palmer, Reclamation District 403
Richard Johnson, Reclamation District 828
Randell D. Norman, Reclamation District 1614

Gerry Sperry, Reclamation District 2042
Cristopher Neudeck, Reclamation District 17,
RD 17 Engineer
Dante John Nomellini, Reclamation District 17 and
Reclamation District 404, Attorney
Jay Punia, California Reclamation Board,
General Manager
Ricardo Pineda, CA DWR, NFIP State
Coordinator
Judy Soutiere, USACE, Sacramento District
Senator Feinstein State Office
Senator Boxer State Office
Representative McNerney District Office
Representative Cardoza District Office

U.S. Department of Homeland Security
1111 Broadway, Suite 1200
Oakland, CA 94607-4052



FEMA

May 24, 2007

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

The Honorable Kristy Sayles, Mayor
City of Lathrop
390 Towne Centre Drive
Lathrop, CA 95330

Dear Mayor Sayles:

This letter is in regard to the Weston Ranch West levee that is accredited on the effective Flood Insurance Rate Map (FIRM) and in the effective Flood Insurance Study (FIS) report for the City of Ripon. This levee is identified with ID # P342 along the San Joaquin River on an enclosure to this letter. The U.S. Department of Homeland Security, Federal Emergency Management Agency (FEMA), is in the process of producing a countywide FIS report and Digital Flood Insurance Rate Map (DFIRM) for San Joaquin County, CA. This effort is being undertaken as part of FEMA's Flood Map Modernization Program.

Flood hazard information presented on the effective FIRM and in the FIS report is based, in some areas, on flood protection provided by the levee identified on the enclosure. Based on the information available and on the mapping standards of the National Flood Insurance Program (NFIP) at the time that the FIS was performed, FEMA accredited the levee with providing protection from the flood that has a 1-percent-chance of being equaled or exceeded in any given year. This 1-percent-annual-chance flood also is referred to as the base flood.

For FEMA to continue to accredit the identified levee with providing protection from the base flood, the levee must meet the criteria of the Code of Federal Regulations, Title 44, Section 65.10 (44 CFR 65.10), titled "Mapping of Areas Protected by Levee Systems" (copy enclosed). In accordance with 44 CFR 65.10(a), it is the responsibility of the community or other party seeking recognition of a levee system, to provide the data defined and outlined within the regulation. Specifically, the design and construction data provided must be certified by a registered professional engineer or by a Federal agency with responsibility for levee design.

FEMA understands that it may take time to acquire and/or assemble the documentation necessary to fully comply with 44 CFR 65.10. Therefore, FEMA has incorporated a process into the schedule of flood Map Modernization that, if needed, will provide the City of Lathrop with additional time to submit all the necessary documentation. Initiation of this process can take place only if the levee owner, and a representative of each impacted community sign and return the enclosed agreement to the FEMA Region IX office within 90 days of the date of this letter (before August 23, 2007). Completion and submittal of the agreement will serve as an official request that FEMA label the levee as a Provisionally Accredited Levee (PAL) on the DFIRM and will serve as agreement that, to the best of your knowledge, the levee meets the criteria of 44 CFR 65.10. It is the responsibility of the levee owner to submit the data required by 44 CFR 65.10 before FEMA can accredit the levee as providing protection from the base flood. The

completed agreement must be submitted to the FEMA Region IX office before August 23, 2007 for the levee to receive the PAL designation.

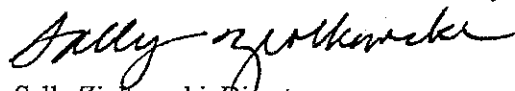
By endorsing the agreement, you state that all the necessary documentation will be provided within 2 years to comply with 44 CFR 65.10; that is before August 23, 2009. If you are unable to submit all of the documentation necessary to meet the criteria of 44 CFR 65.10 before this date, FEMA will initiate a map revision to redesignate certain areas on the landward side of the levee as floodprone.

Levees will be labeled as PALs during the 24-month period to convey to map users that levee certification verification is underway. FEMA recommends that the levee owner and the impacted communities implement outreach efforts to inform affected property owners that an assessment of the levee is underway. FEMA also encourages the purchase of flood insurance, even though coverage is not federally required for the areas landward of the accredited levee.

If the documentation necessary to fully comply with 44 CFR 65.10, including an existing operation and maintenance plan and record of on-site inspection, is readily available, please submit the data to this office. Upon receipt of your submittal, FEMA will review the data and determine whether the levee will continue to be accredited with providing protection from the base flood.

If you have additional questions regarding the specific submittal requirements, please contact Kathy Schaefer, Map Modernization Regional Engineer, of my staff, either by telephone at (510) 627-7129 or by facsimile at (510) 627-7147. We look forward to working with you and community officials to address this important matter. If there is anything we can do to facilitate the submittal process, please let us know.

Sincerely,



Sally Ziolkowski, Director
Mitigation Division
FEMA Region IX

Enclosures:

- Title 44 of the Code of Federal Regulations (CFR), Section 65.10 (44 CFR 65.10)
- Requirements of 44 CFR Section 65.10: Mapping of Areas Protected by Levee Systems
- Letter of Agreement and Request for Provisionally Accredited Levee (PAL) Designation and Agreement to Provide Adequate Compliance With the Code of Federal Regulations, Title 44, Section 65.10 (44 CFR 65.10)
- Levee Status Map
- Levee Status Table

cc: Yvonne Quiring, City of Lathrop, Acting
City Manager
Deanna Walsh, City of Lathrop, Floodplain
Administrator
Cristopher Neudeck, Reclamation District 17,
RD 17 Engineer
Dante John Nomellini, Reclamation District 17,
RD 17 Attorney
Jay Punia, California Reclamation Board,
General Manager

Ricardo Pineda, CA DWR, NFIP State
Coordinator
Judy Soutiere, USACE, Sacramento District
Senator Feinstein State Office
Senator Boxer State Office
Representative McNerney District Office
Representative Cardoza District Office

U.S. Department of Homeland Security
1111 Broadway, Suite 1200
Oakland, CA 94607-4052



FEMA

May 24, 2007

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Victor Mow, Chairman
San Joaquin County Board of Supervisors
222 East Weber Avenue
Stockton, CA 95202

Dear Chairman Mow:

This letter is in regard to the levees that are accredited on the effective Flood Insurance Rate Map (FIRM) and in the effective Flood Insurance Study (FIS) report for the unincorporated areas of San Joaquin County. These levees are identified on an enclosure to this letter. The U.S. Department of Homeland Security, Federal Emergency Management Agency (FEMA), is in the process of producing a countywide FIS-report and Digital Flood Insurance Rate Map (DFIRM) for San Joaquin County, CA. This effort is being undertaken as part of FEMA's Flood Map Modernization Program.

Flood hazard information presented on the effective FIRM and in the FIS report is based, in some areas, on flood protection provided by the levees identified on the enclosure. Based on the information available and on the mapping standards of the National Flood Insurance Program (NFIP) at the time that the FIS was performed, FEMA accredited the levees with providing protection from the flood that has a 1-percent-chance of being equaled or exceeded in any given year. The 1-percent-annual-chance flood also is referred to as the base flood.

For FEMA to continue to accredit the identified levees with providing protection from the base flood, the levees must meet the criteria of the Code of Federal Regulations, Title 44, Section 65.10 (44 CFR 65.10), titled "Mapping of Areas Protected by Levee Systems" (copy enclosed). In accordance with 44 CFR 65.10(a), it is the responsibility of the community or other party seeking recognition of a levee system, to provide the data defined and outlined within the regulation. Specifically, the design and construction data provided must be certified by a registered professional engineer or by a Federal agency with responsibility for levee design.

FEMA understands that it may take time to acquire and/or assemble the documentation necessary to fully comply with 44 CFR 65.10. Therefore, FEMA has incorporated a process into the schedule of Flood Map Modernization that, if needed, will provide San Joaquin County with additional time to submit all the necessary documentation. Initiation of this process can take place only if the levee owner and a representative of each impacted community sign and return the enclosed agreement to the FEMA Region IX office within 90 days of the date of this letter (before August 23, 2007). This offer is being made only for the levees that are identified as "May be PAL A Eligible" or "May be PAL B Eligible" in the Levee Status column of the attached Levee Status Table.

Completion and submittal of the agreement, will serve as an official request that FEMA label the levee as a Provisionally Accredited Levee (PAL) on the DFIRM and will serve as agreement that, to the best of your knowledge, the levee meets the criteria of 44 CFR 65.10. It is the responsibility of the levee owner to submit the data required by 44 CFR 65.10 before FEMA can accredit the levee as providing protection from the base flood. The completed package must be submitted to the FEMA Region IX office before August 23, 2007 for the levee to receive the PAL designation. Please note that a levee that has maintenance deficiencies is not eligible for PAL consideration.

By endorsing the enclosed agreement, you state that all the necessary documentation will be provided within 2-years to comply with 44 CFR 65.10; that is before August 23, 2009. If you are unable to submit all the documentation necessary to meet the criteria of 44 CFR 65.10 before this date, FEMA will initiate a map revision to redesignate certain areas on the landward side of the levee as floodprone.

Levees will be labeled as PALs during the 24-month period to convey to map users that levee certification verification is underway. FEMA recommends that the levee owner and the impacted communities implement outreach efforts to inform affected property owners that an assessment of the levee is underway. FEMA also encourages the purchase of flood insurance, even though coverage is not federally required for the areas landward of the accredited levee.

If the documentation necessary to fully comply with 44 CFR 65.10, including an existing operation and maintenance plan and record of on-site inspection, is readily available, please submit the data to this office. Upon receipt of your submittal, FEMA will review the data and determine whether the levee will continue to be accredited with providing protection from the base flood.

The levees identified as "May be PAL B Eligible" in the Levee Status column of the attached Levee Status Table have received an acceptable maintenance level rating from the U. S. Army Corps of Engineers (USACE) in a recent inspection review. The levees identified as "May be PAL A Eligible" in the Levee Status column of the attached Levee Status Table are not in the USACE program and, therefore, do not have an approved maintenance review for FEMA purposes. If the only grounds for a "May be PAL A Eligible" levee not currently meeting the 44 CFR 65.10 criteria or PAL requirements are **maintenance issues**, then the FEMA Region IX office must be contacted by letter to bring attention to the matter before the end of this 90-day period to submit the enclosed PAL agreement. If you notify FEMA that the levee has known maintenance deficiencies, then a 1-year correction period can be provided to remedy these deficiencies. This 1-year correction period would begin on August 23, 2007, if you notify FEMA within 90 days of the date of this letter. During the 1-year correction period, FEMA will move forward with the current flood hazard mapping project as if the areas landward of the levee is to be located in a Special Flood Hazard Area (SFHA); the mapped area subject to inundation by the base flood. However, FEMA will delay issuance of the Letter of Final Determination (LFD) and effective DFIRM until the 1-year correction period has elapsed.

For FEMA to remove the proposed SFHA landward of the levee, the following requirements must be met within the 1-year correction period:

- All the criteria contained in 44 CFR 65.10 submitted to FEMA, or
- Submittal of the entire PAL application, including the following documentation:
 - An agreement signed by the community and/or levee owner stating that the PAL designation is warranted because the levee meets the requirements of 44 CFR 65.10;


- A copy of the adopted operation and maintenance plan for the levee; and
- Records of levee maintenance and operation, as well as tests of the mechanized interior drainage systems, if applicable.

Once the 1-year correction period has expired, FEMA will assess any submitted data and determine whether any mapping revisions are necessary. If no data have been submitted within the 1-year correction period, or if the submitted data are determined inadequate, FEMA will issue the LFD and effective DFIRM to show the areas landward of a maintenance deficient levee as located in a SFHA. However, if all of the criteria of 44 CFR 65.10 or the entire PAL application is submitted before the 1-year correction period has elapsed, then FEMA will show the levee on the newly effective DFIRM as accredited or provisionally accredited, as applicable.

The levees that are identified as "May be PAL C-2 Eligible" in the Levee Status column of the attached Levee Status Table have **not** received an acceptable maintenance level rating from the U. S. Army Corps of Engineers (USACE) in a recent inspection review. These "May be PAL C-2 Eligible" levees cannot be considered for a PAL agreement unless the maintenance deficiencies are corrected within a one year time frame established by USACE. A separate letter will be sent to the owners of these levees regarding this issue.

If you have additional questions regarding the specific submittal requirements, please contact Kathy Schaefer, Map Modernization Regional Engineer, of my staff, either by telephone at (510) 627-7129 or by facsimile at (510) 627-7147. We look forward to working with you and community officials to address this important matter. If there is anything we can do to facilitate the submittal process, please let us know.

Sincerely,


Sally Ziolkowski, Director
Mitigation Division
FEMA Region IX

Enclosures:

- Title 44 of the Code of Federal Regulations (CFR), Section 65.10 (44 CFR 65.10)
- Requirements of 44 CFR Section 65.10: Mapping of Areas Protected by Levee Systems
- Letter of Agreement and Request for Provisionally Accredited Levee (PAL) Designation and Agreement to Provide Adequate Compliance With the Code of Federal Regulations, Title 44, Section 65.10 (44 CFR 65.10)
- Levee Status Map
- Levee Status Table

cc: Charles Kelly, San Joaquin County,
Floodplain Administrator
Charles Davis, NRCS,
State Conservation Engineer
Roger Churchwell, San Joaquin County Flood
Control and Water Conservation
District, Senior Civil Engineer
James Giottonini, City of Stockton,
Floodplain Administrator; and San Joaquin Area
Flood Control Agency, Executive Director
Al Warren Hoslett, Reclamation District 1,
2089 and 2090, Attorney
Cristopher Neudeck, Reclamation District 17,
Engineer

Dante John Nomellini, Reclamation District 17,
Attorney
Randell D. Norman, Reclamation District 1614,
President
Gerald Sperry, Reclamation District 2042
Donald Machado, Reclamation District 2064
Jay Punia, California Reclamation Board,
General Manager
Ricardo Pineda, CA DWR,
NFIP State Coordinator
Judy Soutiere, USACE, Sacramento District
Senator Feinstein State Office
Senator Boxer State Office
Representative McNerney District Office
Representative Cardoza District Office

U.S. Department of Homeland Security
1111 Broadway, Suite 1200
Oakland, CA 94607-4052



FEMA

May 24, 2007

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

The Honorable Bob Johnson, Mayor
City of Lodi
P.O. Box 3006
Lodi, CA 95241

Dear Mayor Johnson:

This letter is in regard to the levees that are accredited on the effective Flood Insurance Rate Map (FIRM) and in the effective Flood Insurance Study (FIS) report for the City of Lodi. These levees are identified with ID #s P69 and P70 along the Mokelumne River on an enclosure to this letter. The U.S. Department of Homeland Security, Federal Emergency Management Agency (FEMA), is in the process of producing a countywide FIS report and Digital Flood Insurance Rate Map (DFIRM) for San Joaquin County, CA. This effort is being undertaken as part of FEMA's Flood Map Modernization Program.

Flood hazard information presented on the effective FIRM and in the FIS report is based, in some areas, on flood protection provided by the levees identified on the enclosure. Based on the information available and on the mapping standards of the National Flood Insurance Program (NFIP) at the time that the FIS was performed, FEMA accredited the levees with providing protection from the flood that has a 1-percent-chance of being equaled or exceeded in any given year. The 1-percent-annual-chance flood also is referred to as the base flood.

For FEMA to continue to accredit the identified levees with providing protection from the base flood, the levees must meet the criteria of the Code of Federal Regulations, Title 44, Section 65.10 (44 CFR 65.10), titled "Mapping of Arcas Protected by Levee Systems" (copy enclosed). In accordance with 44 CFR 65.10(a), it is the responsibility of the community or other party seeking recognition of a levee system, to provide the data defined and outlined within the regulation. Specifically, the design and construction data provided must be certified by a registered professional engineer or by a Federal agency with responsibility for levee design.

FEMA understands that it may take time to acquire and/or assemble the documentation necessary to fully comply with 44 CFR 65.10. Therefore, FEMA has incorporated a process into the schedule of Flood Map Modernization that, if needed, will provide the City of Lodi with additional time to submit all the necessary documentation. Initiation of this process can take place only if the levee owner and a representative of each impacted community sign and return the enclosed agreement to the FEMA Region IX office within 90 days of the date of this letter (before August 23, 2007).

In addition, the following must be provided:

- o A copy of the adopted operation and maintenance plan for the levee; and

- o Records of levee maintenance and operation, as well as tests of the mechanized interior drainage systems, if applicable.

Completion and submittal of the agreement, as well as the operation and maintenance plan and records, will serve as an official request that FEMA label the levee as a Provisionally Accredited Levee (PAL) on the DFIRM and will serve as agreement that, to the best of your knowledge, the levee meets the criteria of 44 CFR 65.10. It is the responsibility of the levee owner to submit the data required by 44 CFR 65.10 before FEMA can accredit the levee as providing protection from the base flood. The completed package must be submitted to the FEMA Region IX office before August 23, 2007 for the levee to receive the PAL designation. Please note that a levee that has maintenance deficiencies is not eligible for PAL consideration.

By endorsing the enclosed agreement, you state that all the necessary documentation will be provided within 2-years to comply with 44 CFR 65.10; that is before August 23, 2009. If you are unable to submit all the documentation necessary to meet the criteria of 44 CFR 65.10 before this date, FEMA will initiate a map revision to redesignate certain areas on the landward side of the levee as floodprone.

Levees will be labeled as PALs during the 24-month period to convey to map users that levee certification verification is underway. FEMA recommends that the levee owner and the impacted communities implement outreach efforts to inform affected property owners that an assessment of the levee is underway. FEMA also encourages the purchase of flood insurance, even though coverage is not federally required for the areas landward of the accredited levee.

If the documentation necessary to fully comply with 44 CFR 65.10, including an existing operation and maintenance plan and record of on-site inspection, is readily available, please submit the data to this office. Upon receipt of your submittal, FEMA will review the data and determine whether the levee will continue to be accredited with providing protection from the base flood.

If the only grounds for the levee in question not currently meeting the 44 CFR 65.10 criteria or PAL requirements are **maintenance issues**, then the FEMA Region IX office must be contacted by letter to bring attention to the matter before the end of this 90-day period to submit the enclosed PAL agreement. If you notify FEMA that the levee has known maintenance deficiencies, then a 1-year correction period can be provided to remedy these deficiencies. This 1-year correction period would begin on August 23, 2007, if you notify FEMA within 90 days of the date of this letter. During the 1-year correction period, FEMA will move forward with the current flood hazard mapping project as if the areas landward of the levee is to be located in a Special Flood Hazard Area (SFHA); the mapped area subject to inundation by the base flood. However, FEMA will delay issuance of the Letter of Final Determination (LFD) and effective DFIRM until the 1-year correction period has elapsed.

For FEMA to remove the SFHA landward of the levee, the following requirements must be met within the 1-year correction period:

- All the criteria contained in 44 CFR 65.10 submitted to FEMA, or
- Submittal of the entire PAL application, including the following documentation:
 - o An agreement signed by the community and/or levee owner stating that the PAL designation is warranted because the levee meets the requirements of 44 CFR 65.10;
 - o A copy of the adopted operation and maintenance plan for the levee; and
 - o Records of levee maintenance and operation, as well as tests of the mechanized interior drainage systems, if applicable.

Mayor Bob Johnson
Page 3 of 3

Once the 1-year correction period has expired, FEMA will assess any submitted data and determine whether any mapping revisions are necessary. If no data have been submitted within the 1-year correction period, or if the submitted data are determined inadequate, FEMA will issue the LFD and effective DFIRM to show the areas landward of a maintenance deficient levee as located in a SFHA. However, if all of the criteria of 44 CFR 65.10 or the entire PAL application is submitted before the 1-year correction period has elapsed, then FEMA will show the levee on the newly effective DFIRM as accredited or provisionally accredited, as applicable.

If you have additional questions regarding the specific submittal requirements, please contact Kathy Schaefer, Map Modernization Regional Engineer, of my staff, either by telephone at (510) 627-7129 or by facsimile at (510) 627-7147. We look forward to working with you and community officials to address this important matter. If there is anything we can do to facilitate the submittal process, please let us know.

Sincerely,



Sally Ziolkowski, Director
Mitigation Division
FEMA Region IX

Enclosures:

- Title 44 of the Code of Federal Regulations (CFR), Section 65.10 (44 CFR 65.10)
- Requirements of 44 CFR Section 65.10: Mapping of Areas Protected by Levee Systems
- Letter of Agreement and Request for Provisionally Accredited Levee (PAL) Designation and Agreement to Provide Adequate Compliance With the Code of Federal Regulations, Title 44, Section 65.10 (44 CFR 65.10)
- Levee Status Map
- Levee Status Table

cc: Blair King, City of Lodi, City Manager
Randy Hatch, City of Lodi, Floodplain Administrator
Jay Punia, California Reclamation Board, General Manager
Ricardo Pineda, CA DWR, NFIP State Coordinator
Judy Soutiere, USACE, Sacramento District
Senator Feinstein State Office
Senator Boxer State Office
Representative McNerney District Office

U.S. Department of Homeland Security
1111 Broadway, Suite 1200
Oakland, CA 94607-4052



FEMA

May 30, 2007

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William O'Brien, Chairman
Stanislaus County Board of Supervisors
1010 Tenth Street, Suite 6500
Modesto, CA 95354

Dear Chairman O'Brien:

This letter is in regard to the levees that are accredited on the effective Flood Insurance Rate Map (FIRM) and in the effective Flood Insurance Study (FIS) report for the unincorporated areas of Stanislaus County. These levees are identified on an enclosure to this letter. The U.S. Department of Homeland Security, Federal Emergency Management Agency (FEMA), is in the process of producing a countywide FIS report and Digital Flood Insurance Rate Map (DFIRM) for Stanislaus County, CA. This effort is being undertaken as part of FEMA's Flood Map Modernization Program.

Flood hazard information presented on the effective FIRM and in the FIS report is based, in some areas, on flood protection provided by the levees identified on the enclosure. Based on the information available and on the mapping standards of the National Flood Insurance Program (NFIP) at the time that the FIS was performed, FEMA accredited the levees with providing protection from the flood that has a 1-percent-chance of being equaled or exceeded in any given year. The 1-percent-annual-chance flood also is referred to as the base flood.

For FEMA to continue to accredit the identified levees with providing protection from the base flood, the levees must meet the criteria of the Code of Federal Regulations, Title 44, Section 65.10 (44 CFR 65.10), titled "Mapping of Areas Protected by Levee Systems" (copy enclosed). In accordance with 44 CFR 65.10(a), it is the responsibility of the community or other party seeking recognition of a levee system, to provide the data defined and outlined within the regulation. Specifically, the design and construction data provided must be certified by a registered professional engineer or by a Federal agency with responsibility for levee design.

FEMA understands that it may take time to acquire and/or assemble the documentation necessary to fully comply with 44 CFR 65.10. Therefore, FEMA has incorporated a process into the schedule of Flood Map Modernization that, if needed, will provide Stanislaus County with additional time to submit all the necessary documentation. Initiation of this process can take place only if the levee owner and a representative of each impacted community sign and return the enclosed agreement to the FEMA Region IX office within 90 days of the date of this letter (before August 29, 2007).

In addition, the following must be provided:

- o A copy of the adopted operation and maintenance plan for the levee; and

- Records of levee maintenance and operation, as well as tests of the mechanized interior drainage systems, if applicable.

Completion and submittal of the agreement, as well as the operation and maintenance plan and records, will serve as an official request that FEMA label the levee as a Provisionally Accredited Levee (PAL) on the DFIRM and will serve as agreement that, to the best of your knowledge, the levee meets the criteria of 44 CFR 65.10. It is the responsibility of the levee owner to submit the data required by 44 CFR 65.10 before FEMA can accredit the levee as providing protection from the base flood. The completed package must be submitted to the FEMA Region IX office before August 29, 2007 for the levee to receive the PAL designation. Please note that a levee that has maintenance deficiencies is not eligible for PAL consideration.

By endorsing the enclosed agreement, you state that all the necessary documentation will be provided within 2-years to comply with 44 CFR 65.10; that is before August 29, 2009. If you are unable to submit all the documentation necessary to meet the criteria of 44 CFR 65.10 before this date, FEMA will initiate a map revision to redesignate certain areas on the landward side of the levee as floodprone.

Levees will be labeled as PALs during the 24-month period to convey to map users that levee certification verification is underway. FEMA recommends that the levee owner and the impacted communities implement outreach efforts to inform affected property owners that an assessment of the levee is underway. FEMA also encourages the purchase of flood insurance, even though coverage is not federally required for the areas landward of the accredited levee.

If the documentation necessary to fully comply with 44 CFR 65.10, including an existing operation and maintenance plan and record of on-site inspection, is readily available, please submit the data to this office. Upon receipt of your submittal, FEMA will review the data and determine whether the levee will continue to be accredited with providing protection from the base flood.

If the only grounds for the levee in question not currently meeting the 44 CFR 65.10 criteria or PAL requirements are **maintenance issues**, then the FEMA Region IX office must be contacted by letter to bring attention to the matter before the end of this 90-day period to submit the enclosed PAL agreement. If you notify FEMA that the levee has known maintenance deficiencies, then a 1-year correction period can be provided to remedy these deficiencies. This 1-year correction period would begin on August 29, 2007, if you notify FEMA within 90 days of the date of this letter. During the 1-year correction period, FEMA will move forward with the current flood hazard mapping project as if the areas landward of the levee is to be located in a Special Flood Hazard Area (SFHA); the mapped area subject to inundation by the base flood. However, FEMA will delay issuance of the Letter of Final Determination (LFD) and effective DFIRM until the 1-year correction period has elapsed.

For FEMA to remove the SFHA landward of the levee, the following requirements must be met within the 1-year correction period:

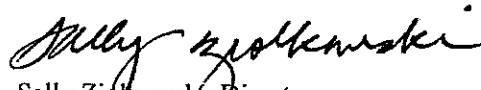
- All the criteria contained in 44 CFR 65.10 submitted to FEMA, or
- Submittal of the entire PAL application, including the following documentation:
 - An agreement signed by the community and/or levee owner stating that the PAL designation is warranted because the levee meets the requirements of 44 CFR 65.10;
 - A copy of the adopted operation and maintenance plan for the levee; and

- o Records of levee maintenance and operation, as well as tests of the mechanized interior drainage systems, if applicable.

Once the 1-year correction period has expired, FEMA will assess any submitted data and determine whether any mapping revisions are necessary. If no data have been submitted within the 1-year correction period, or if the submitted data are determined inadequate, FEMA will issue the LFD and effective DFIRM to show the areas landward of a maintenance deficient levee as located in a SFHA. However, if all of the criteria of 44 CFR 65.10 or the entire PAL application is submitted before the 1-year correction period has elapsed, then FEMA will show the levee on the newly effective DFIRM as accredited or provisionally accredited, as applicable.

If you have additional questions regarding the specific submittal requirements, please contact Eric Simmons, Map Modernization Regional Engineer, of my staff, either by telephone at (510) 627-7029 or by facsimile at (510) 627-7147. We look forward to working with you and community officials to address this important matter. If there is anything we can do to facilitate the submittal process, please let us know.

Sincerely,



Sally Ziolkowski, Director
Mitigation Division
FEMA Region IX

Enclosures:

- Title 44 of the Code of Federal Regulations (CFR), Section 65.10 (44 CFR 65.10)
- Requirements of 44 CFR Section 65.10: Mapping of Areas Protected by Levee Systems
- Letter of Agreement and Request for Provisionally Accredited Levee (PAL) Designation and Agreement to Provide Adequate Compliance With the Code of Federal Regulations, Title 44, Section 65.10 (44 CFR 65.10)
- Levee Status Map
- Levee Status Table

cc: Tony Refuerzo, Stanislaus County, Floodplain Administrator
Ricardo Pineda, CA DWR, NFIP State Coordinator
Judy Soutiere, USACE, Sacramento District
Senator Feinstein State Office
Senator Boxer State Office
Representative Cardoza District Office
Representative Radanovich District Office

U.S. Department of Homeland Security
1111 Broadway, Suite 1200
Oakland, CA 94607-4052



FEMA

May 30, 2007

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

The Honorable Chris Crifasi, Mayor
City of Riverbank
6707 Third Street
Riverbank, CA 95367

Dear Mayor Crifasi:

This letter is in regard to the levee that is accredited on the effective Flood Insurance Rate Map (FIRM) and in the effective Flood Insurance Study (FIS) report for the City of Riverbank. This levee is identified with ID # P15 along the Stanislaus River on an enclosure to this letter. The U.S. Department of Homeland Security, Federal Emergency Management Agency (FEMA), is in the process of producing a countywide FIS report and Digital Flood Insurance Rate Map (DFIRM) for Stanislaus County, CA. This effort is being undertaken as part of FEMA's Flood Map Modernization Program.

Flood hazard information presented on the effective FIRM and in the FIS report is based, in some areas, on flood protection provided by the levee identified on the enclosure. Based on the information available and on the mapping standards of the National Flood Insurance Program (NFIP) at the time that the FIS was performed, FEMA accredited the levee with providing protection from the flood that has a 1-percent-chance of being equaled or exceeded in any given year. The 1-percent-annual-chance flood also is referred to as the base flood.

For FEMA to continue to accredit the identified levee with providing protection from the base flood, the levee must meet the criteria of the Code of Federal Regulations, Title 44, Section 65.10 (44 CFR 65.10), titled "Mapping of Areas Protected by Levee Systems" (copy enclosed). In accordance with 44 CFR 65.10(a), it is the responsibility of the community or other party seeking recognition of a levee system, to provide the data defined and outlined within the regulation. Specifically, the design and construction data provided must be certified by a registered professional engineer or by a Federal agency with responsibility for levee design.

FEMA understands that it may take time to acquire and/or assemble the documentation necessary to fully comply with 44 CFR 65.10. Therefore, FEMA has incorporated a process into the schedule of Flood Map Modernization that, if needed, will provide the City of Riverbank with additional time to submit all the necessary documentation. Initiation of this process can take place only if the levee owner and a representative of each impacted community sign and return the enclosed agreement to the FEMA Region IX office within 90 days of the date of this letter (before August 29, 2007).

In addition, the following must be provided:

- o A copy of the adopted operation and maintenance plan for the levee; and

- Records of levee maintenance and operation, as well as tests of the mechanized interior drainage systems, if applicable.

Completion and submittal of the agreement, as well as the operation and maintenance plan and records, will serve as an official request that FEMA label the levee as a Provisionally Accredited Levee (PAL) on the DFIRM and will serve as agreement that, to the best of your knowledge, the levee meets the criteria of 44 CFR 65.10. It is the responsibility of the levee owner to submit the data required by 44 CFR 65.10 before FEMA can accredit the levee as providing protection from the base flood. The completed package must be submitted to the FEMA Region IX office before August 29, 2007 for the levee to receive the PAL designation. Please note that a levee that has maintenance deficiencies is not eligible for PAL consideration.

By endorsing the enclosed agreement, you state that all the necessary documentation will be provided within 2-years to comply with 44 CFR 65.10; that is before August 29, 2009. If you are unable to submit all the documentation necessary to meet the criteria of 44 CFR 65.10 before this date, FEMA will initiate a map revision to redesignate certain areas on the landward side of the levee as floodprone.

Levees will be labeled as PALs during the 24-month period to convey to map users that levee certification verification is underway. FEMA recommends that the levee owner and the impacted communities implement outreach efforts to inform affected property owners that an assessment of the levee is underway. FEMA also encourages the purchase of flood insurance, even though coverage is not federally required for the areas landward of the accredited levee.

If the documentation necessary to fully comply with 44 CFR 65.10, including an existing operation and maintenance plan and record of on-site inspection, is readily available, please submit the data to this office. Upon receipt of your submittal, FEMA will review the data and determine whether the levee will continue to be accredited with providing protection from the base flood.

If the only grounds for the levee in question not currently meeting the 44 CFR 65.10 criteria or PAL requirements are **maintenance issues**, then the FEMA Region IX office must be contacted by letter to bring attention to the matter before the end of this 90-day period to submit the enclosed PAL agreement. If you notify FEMA that the levee has known maintenance deficiencies, then a 1-year correction period can be provided to remedy these deficiencies. This 1-year correction period would begin on August 29, 2007, if you notify FEMA within 90 days of the date of this letter. During the 1-year correction period, FEMA will move forward with the current flood hazard mapping project as if the areas landward of the levee is to be located in a Special Flood Hazard Area (SFHA); the mapped area subject to inundation by the base flood. However, FEMA will delay issuance of the Letter of Final Determination (LFD) and effective DFIRM until the 1-year correction period has elapsed.

For FEMA to remove the SFHA landward of the levee, the following requirements must be met within the 1-year correction period:

- All the criteria contained in 44 CFR 65.10 submitted to FEMA, or
- Submittal of the entire PAL application, including the following documentation:
 - An agreement signed by the community and/or levee owner stating that the PAL designation is warranted because the levee meets the requirements of 44 CFR 65.10;
 - A copy of the adopted operation and maintenance plan for the levee; and
 - Records of levee maintenance and operation, as well as tests of the mechanized interior drainage systems, if applicable.

Mayor Chris Crifasi
Page 3 of 3

Once the 1-year correction period has expired, FEMA will assess any submitted data and determine whether any mapping revisions are necessary. If no data have been submitted within the 1-year correction period, or if the submitted data are determined inadequate, FEMA will issue the LFD and effective DFIRM to show the areas landward of a maintenance deficient levee as located in a SFHA. However, if all of the criteria of 44 CFR 65.10 or the entire PAL application is submitted before the 1-year correction period has elapsed, then FEMA will show the levee on the newly effective DFIRM as accredited or provisionally accredited, as applicable.

If you have additional questions regarding the specific submittal requirements, please contact Eric Simmons, Map Modernization Regional Engineer, of my staff, either by telephone at (510) 627-7029 or by facsimile at (510) 627-7147. We look forward to working with you and community officials to address this important matter. If there is anything we can do to facilitate the submittal process, please let us know.

Sincerely,



Sally Ziolkowski, Director
Mitigation Division
FEMA Region IX

Enclosures:

- Title 44 of the Code of Federal Regulations (CFR), Section 65.10 (44 CFR 65.10)
- Requirements of 44 CFR Section 65.10: Mapping of Areas Protected by Levee Systems
- Letter of Agreement and Request for Provisionally Accredited Levee (PAL) Designation and Agreement to Provide Adequate Compliance With the Code of Federal Regulations, Title 44, Section 65.10 (44 CFR 65.10)
- Levee Status Map
- Levee Status Table

cc: Richard Holmer, City of Riverbank, City Manager and Floodplain Administrator
Ricardo Pineda, CA DWR, NFIP State Coordinator
Judy Soutiere, USACE, Sacramento District
Senator Feinstein State Office
Senator Boxer State Office
Representative Radanovich District Office

DEPARTMENT OF WATER RESOURCES

1416 NINTH STREET, P.O. BOX 942836
SACRAMENTO, CA 94236-0001
(916) 653-5791



JUN 19 2007

Honorable Kristy Syles
Mayor of the City of Lathrop
390 Towne Centre Drive
Lathrop, California 95330

Dear Mayor Syles:

Over the past few years, Californians have become increasingly aware of the need for better flood protection, especially for many Central Valley communities. Governor Schwarzenegger and the State legislature have significantly increased State funding for levee repairs and other flood improvements to enhance public safety, and voters approved two bond measures last November that will invest approximately \$5 billion to strengthen our flood control systems.

As the State agency charged with flood management, the Department of Water Resources (DWR) is actively engaged in efforts to provide communities with the best available information on the level of flood protection afforded by levees and other flood systems. Related to this effort, DWR has been asked to support the Provisionally Accredited Levee (PAL) process for delaying the floodplain remapping effort by the Federal Emergency Management Agency (FEMA) for the lands protected by Reclamation District 17 (RD 17) levees. At the request of RD 17, DWR agreed to have its consultant perform a preliminary evaluation of a few levee reaches where recent DWR geotechnical investigations indicated under-seepage concerns. These preliminary analyses were completed by FUGRO West, Inc. using two separate approaches (U.S. Army of Corps of Engineers' blanket theory from its engineering manual, and finite element analyses using the computer program SEEP/W), a detailed write-up for each of which is enclosed. Both approaches calculated unacceptably low factors of safety for under-seepage during a future 100-year flood event. There is also concern for through-seepage gradients through the levee itself. Based on these results, we believe that there is recent and significant evidence that the levees do not provide a 100-year level of flood protection. Accordingly, DWR cannot support either the PAL process or a recertification of the RD 17 levees at this time.

Honorable Kristy Syles

JUN 19 2007

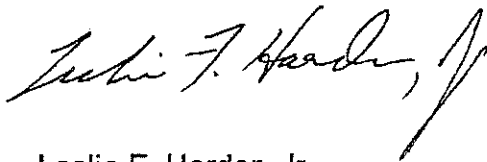
Page 2

Over the next seven months, DWR plans to conduct additional explorations and evaluations to further detail the geotechnical adequacy of the RD 17 levees. The work in RD 17 is part of DWR's efforts to fully evaluate over 300 miles of federal levees in 12 urban sub-basins of the Central Valley. Eventually, DWR plans to evaluate all 1,600 miles of project levees in the Central Valley. We expect to have a preliminary geotechnical report by mid-August 2007 and a final geotechnical report available by May 2008 for RD 17.

In addition, DWR is working with RD 17 and local agencies to develop plans for repairs and improvements to the RD 17 levees to provide a high-level of flood protection. This work is expected to be carried out over the next several years using local funds, federal funds, and State funding provided through two flood control bonds approved by California voters in November 2006. Upon completion of the envisioned improvements, RD 17 levees will exceed the minimum FEMA requirements for 100-year accreditation. Identification of levee deficiencies is the first step in the process of planning the repairs and improvements.

If you have any questions regarding levee evaluations, please contact me at (916) 653-9502, or your staff may contact Mr. Steve Mahnke, Chief of DWR's Levee Evaluation Branch, at (916) 574-2645.

Sincerely,



Leslie F. Harder, Jr.
Deputy Director

Enclosure

cc: (See attached list.)

cc: Mr. John Hess
United States Army Corps of Engineers
1325 J Street
Sacramento, California 95814-2922

Mr. Henry Long
Reclamation District 17 San Joaquin County
817 Yettner Road
French Camp, California 92531

Mr. Chris Neudeck
Reclamation District 17 San Joaquin County
Post Office Box 844
Stockton, California 95201-0844

Ms. Kathleen Schaefer
Federal Emergency Management Agency
1111 Broadway, Suite 1200
Oakland, California 94607-4052

Mr. Thomas R. Flinn
Director of Public Works for San Joaquin County
Post Office Box 1810
Stockton, California 95201

Mr. Victor Mow
Chairman of the Board of Supervisors for San Joaquin County
Courthouse Room 701
222 East Weber Avenue
Stockton, California 95202

Congressman Dennis Cardoza
Representative, U.S. Congress
435 Cannon House Office Building
Washington, DC 20510-5054

Honorable Mike Machado
Member of the Senate
State Capitol, Room 5066
Sacramento, California 95814

Honorable Dave Cogdill
Member of the Senate
State Capitol, Room 3048
Sacramento, California 95814

Honorable Cathleen Galgiani
Member of the Assembly
State Capitol, Room 2170
Sacramento, California 95814

Honorable Greg Aghazarian
Member of the Assembly
State Capitol, Room 4167
Sacramento, California 95814

Honorable Guy Houston
Member of the Assembly
State Capitol, Room 2130
Sacramento, California 95814

RECLAMATION DISTRICT NO. 17

1812 Burnside Way
Stockton, California 95207
Telephone: (209) 478-1696

Trustees

Henry Long, Pres.
Michael Robinson
Donald W. Widmer

Secretary and Attorney

Everett Conway, Secretary
Dante John Nomellini, Attorney

July 19, 2007

**Via email Kathleen.Schaefer@dhs.gov
And Regular U.S. Mail**

Kathleen Schaefer
U. S. Department of Homeland Security
Federal Emergency Management Agency, Region IX
1111 Broadway, Suite 1200
Oakland, California 94607-4052

Re: Continued Accreditation of Reclamation District No. 17 Levees

Dear Ms. Schaefer:

Thank you for meeting with us on Monday, July 16, 2007. I was pleased that we were able to arrive at a potential solution to continue our levee accreditation and to commit to making real progress in our levee seepage performance. As we discussed in the meeting, this letter sets forth (1) our concerns about the establishment of new criteria without due process, (2) a reiteration of our history to date, (3) an expression of our willingness to cooperate with the California Department of Water Resources, (4) continued progress in improving our drainage features, and (5) interim measures for your consideration to make landowners aware of the issues inherent in living and owning property protected by levees and the value in having flood insurance.

Reclamation District No. 17 (RD 17) is in receipt of a copy of the Department of Water Resources June 19, 2007 letter to Kristy Sales, Mayor of the City of Lathrop, setting forth concerns for seepage as evidence for their belief that the levees do not provide a 100-year level of flood protection. The letter is not a proper basis for denial of continued accreditation of the RD 17 levees as a part of the current map modernization process. The California Department of Water Resources apparently seeks to establish a new seepage gradient requirement for levees that requires structural measures to reduce the need for customary inspection and floodfight measures. Discontinuation of

July 19, 2007

accreditation of levees in the map modernization process is not the appropriate mechanism for establishing such a requirement.

Improved safety of levees is desired by all, however, absolute protection is unattainable. The FEMA 100-year level of protection was never intended to provide absolute protection but rather was a threshold level for protection of urban development necessary for compliance with the federal flood insurance program. FEMA requirements are established through a regulatory process intended to provide those affected with a fair opportunity to be heard and to comply.

Assuming the Department of Water Resources has the authority to establish a seepage gradient requirement for levees to supplant the FEMA requirements, it must comply with the California Administrative Procedure Act and California Environmental Quality Act. The requirement must be clearly defined. It is unclear whether DWR is seeking a seepage requirement the same as that which is outlined in the Corps' technical letter (ETL 1110-2-569) or some other measure. Even the Corps' technical letter has not been processed to the point of incorporation into the Engineer Manual for Design and Construction of Levees and is not part of the FEMA regulations. It is important to note that EM 1110-2-1913 clearly provides:

"4. General. This manual is intended as a guide for designing and constructing levees and not intended to replace the judgment of the design engineer on a particular project."

Only after the new seepage requirement is adequately defined, can the impact of its application be properly evaluated. The general public and those directly affected should be provided the opportunity to comment on the requirements and impacts. If FEMA is asked by the State to adopt the State requirements as its requirements for accreditation of levees within the State, then FEMA should also provide opportunity for comment to the general public and those directly affected as well as provide adequate opportunity for compliance. Levee-related seepage is of course not limited to RD 17 and is an issue that should be addressed with some uniformity throughout the United States.

The retroactive application of the DWR new seepage requirements to previously accredited levees particularly in the case of the RD 17 levees introduces an element of substantial unfairness. The State of California has been a major participant in the design and construction of the RD 17 levees. In about 1956, the State of California was the non-federal sponsor of an RD 17 levee improvement project with the U.S. Corps of Engineers as a part of the federal Lower San Joaquin River and Tributaries Project. The State and the Corps designed and built improvements to the RD 17 levees which were surely intended to be stable. Seepage is not a new concern and was undoubtedly

July 19, 2007

addressed in the design and construction of the project levees. Additionally in 1989 in connection with the review leading to the 1990 FEMA LOMR, the Reclamation Board of the State of California in cooperation with the California Department of Water Resources reviewed and inspected the improvements of the RD 17 levees and provided the following:

"We hereby notify you that the Board acknowledges that the newly constructed levee system meets the elevations and design prism required by FEMA and that all pipelines through the levee crown have an invert elevation above the 100-year Base Flood Elevation as recognized by FEMA. In addition, all rock slope protection, submitted with the levee improvements design, has been placed and meets project specifications.

The Board also acknowledges that the operation and maintenance manual, adopted by Reclamation District No. 17, meets the requirements prescribed in the assurance agreement between Reclamation District No. 17 and the Board dated January 3, 1956." (See attached October 16, 1989, letter from The Reclamation Board to Reclamation District No. 17.)

In January of 1997 the Department of Water Resources participated in the floodfight on the RD 17 levees. The floodfight included addressing seepage and boils. After the floodfight a joint project among the State, the Corps of Engineers and RD 17 was undertaken to repair the seepage and boils which appeared in the 1997 flood event. The repairs were designed by the Corps of Engineers and reviewed by the Department of Water Resources. The only request for improvement of the design of the repairs came from RD 17 as a result of its engineer and geotechnical consultant's review. Neither the Department of Water Resources nor the Corps suggested that additional measures to address seepage be considered or incorporated.

Officials of the Department of Water Resources have stated their concern for State liability as justification for their actions. Missing from their concern is the impact to the landowners, homeowners, and businesses who in good faith relied on the 1990 FEMA accreditation in which the State played a major role.

The objection by the Department of Water Resources to continued accreditation and the offering of a PAL would, if granted, significantly disrupt and disable any effort to improve flood protection. Loss of property values and discontinuation of development will cripple the ability of the homeowners, landowners, businesses and cities to contribute to the funding of the desired improvements which are needed to protect an already established, largely populated and highly-developed area. The hiatus left by waiting for a solution over "the next several years" would be untenable.

July 19, 2007

The seepage through the levee foundation analyses performed for the February 9, 1990, FEMA Letter of Map Revision was recently reviewed by the RD 17 engineer and an independent geotechnical consultant and the conclusions therein determined to remain valid. With levee patrol and customary floodfighting, seepage will not jeopardize levee stability. (See May 21, 2007 letter from Ron Heinzen, Geotechnical Engineer No. 388 of Kleinfelder West, Inc. previously submitted.) The seepage exit gradients were correctly represented in the FEMA submittals for the FEMA 1990 LOMR as ranging from .5 to 1.0 for some locations. Control of significant seepage through levee patrols and appropriate response was part of the accredited plan. Avoidance of seepage exit gradients of .5 or higher was not a part of the FEMA requirements. The RD 17 levees have been maintained and improved since the FEMA 1990 accreditation, particularly with regard to addressing seepage.

RD 17 reasserts its request that accreditation be continued with the understanding that RD 17 and the cities of Lathrop, Stockton and Manteca and the County of San Joaquin will in good faith seek to implement levee improvements to further address seepage and otherwise improve flood protection. In particular, we are looking forward to receiving field data and recommendations from the Department of Water Resources.

The Department of Water Resources is conducting an extensive geotechnical investigation of the RD 17 levees and has expressed its expectation to produce in May 2008 recommendations for levee improvements including alternative designs to address seepage concerns. Once the scope of the State recommended improvements is defined, RD 17, the cities and the county can engage with the State to define a project, obtain the necessary permits, develop the funding and carry out the construction.

Permitting and actual implementation is expected to require a number of years after May 2008 especially if the State continues to be bound to the Corps of Engineers' approval necessitating a "408" permitting process.

RD 17 and the other local stakeholders will work with DWR to accelerate implementation of RD 17 levee improvements. DWR's plan, however, appears to include a 3 to 5 year period for investigation, planning and permitting which must precede construction. Depending upon the extent of the desired improvements, acquisition of right of way and construction would require an additional number of years.

The City of Lathrop has existing requirements for new development which include installation of toe drains near the levees. These requirements are a part of previously approved projects. Segments have already been installed and were effective during the Spring 2006 high water. Evaluation of the effectiveness of such toe drains as to exit gradient calculations is underway. Refinements to the design and

Kathleen Schaefer
Federal Emergency Management Agency 5

July 19, 2007

construction of such toe drains may be accomplished in the short term if and as development proceeds. For the areas outside of the approved developments, interim measures will likely require additional permitting and a longer term.

Interim measures have been discussed with representatives of the cities and county, and the following interim measures to encourage the purchase of flood insurance are proposed for your consideration.

- 1) The cities and the county will provide a recommendation in official city and county correspondence to landowners advising landowners in areas protected by levees to purchase flood insurance. The recommendation will probably be included in an insert mailed with the property tax bill.
- 2) The local agencies will hold at least two public meetings per year informing landowners of the issues associated with living and owning property in areas protected by levees and advising them to purchase flood insurance.
- 3) The cities and county will require in the Subdivision Map approval process for lands within RD 17 that sales transactions for new homes contain a disclosure advising buyers to purchase flood insurance.

A cooperative effort among the federal, state and local interests to expedite actions to improve flood protection is the goal.

Discontinuation of accreditation of the RD 17 levees which have been properly maintained and improved since their accreditation would be extremely unfair and unnecessarily harmful.

Yours very truly,


DANTE JOHN NOMEILLINI
Attorney for Reclamation District No. 17

DJN:ju

cc: City of Stockton, Attn. James Giottonini
City of Lathrop, Attn. Carey Keaton
City of Manteca, Attn. James Stone
County of San Joaquin, Attn. Thomas Flinn
Department of Water Resources, Attn. Leslie F. Harder Jr.
Trustees
Christopher Neudeck
Everett Conway

DEPARTMENT OF WATER RESOURCES
THE RECLAMATION BOARD1 - 9th Street, Room 455-6
Sacramento, CA 95814
(916) 445-9454

October 16, 1989

Mr. Henry Long, President
Reclamation District No. 17
817 W. Yettner Road
French Camp, CA 95231

Dear Mr. Long:

San Joaquin River - Reclamation District No. 17 Levee
Improvement Project, Permit No. 15014 GM

The Reclamation Board of the State of California, in cooperation with the California Department of Water Resources, has reviewed and inspected the improvements of the San Joaquin River-Reclamation District No. 17 levees, Permit No. 15014 GM.

We hereby notify you that the Board acknowledges that the newly constructed levee system meets the elevations and design prism required by FEMA and that all pipelines through the levee crown have an invert elevation above the 100-year Base Flood Elevation as recognized by FEMA. In addition, all rock slope protection, submitted with the levee improvements design, has been placed and meets project specifications.

The Board also acknowledges that the operation and maintenance manual, adopted by Reclamation District No. 17, meets the requirements prescribed in the assurance agreement between Reclamation District No. 17 and the Board dated January 3, 1956.

If you have any questions, please contact me at (916) 445-9454.

Sincerely,

A handwritten signature in dark ink, appearing to read "Raymond E. Barsch".

RAYMOND E. BARSCH
General Manager

U.S. Department of Homeland Security
1111 Broadway, Suite 1200
Oakland, CA 94607-4052

JAY PUNIA



FEMA

July 11, 2007

RECEIVED

JUL 10 2007

Mr. T. R. Flinn, Director of Public Works
San Joaquin County Flood Control & Water Conservation District
1810 East Hazelton Avenue
Stockton, California 95201

Dear Mr. Flinn:

This letter is in response to your June 15, 2007, letter expressing concerns about the 90-day period for responding to the Federal Emergency Management Agency's (FEMA's) offer of Provisionally Accredited Levee (PAL) designations in San Joaquin County. You requested a deferral of the 90-day deadline, which ends August 23, 2007, for submitting PAL agreement forms for the levees identified on the enclosed map and table.

The 90-day PAL offer and corresponding 2-year period to acquire and/or assemble the documentation necessary to fully meet Code of Federal Regulations, Title 44, Section 65.10 (44 CFR 65.10), titled "Mapping of Areas Protected by Levee Systems" is documented in FEMA's March 16, 2007, Revised Procedure Memorandum No. 43 – Guidelines for Identifying Provisionally Accredited Levees (copy enclosed). This policy is being applied uniformly and nationwide for communities with PAL eligible levees. As has been discussed in prior meetings and telephone conversations with San Joaquin County officials and levee owner representatives, the 90-day PAL offer is a one-time only option and cannot be deferred or extended.

FEMA released Procedure Memorandum No. 43 to accommodate levee owners' desire for additional time to document the condition of their levees, as requested by Congress and other constituents. FEMA is committed to clearly identifying the flood hazards in areas behind levees to protect lives and property and to make sure individuals understand the risks they face so they are able to take steps to reduce future flood losses. Delays or deferrals to this process would compromise public safety.

The following responses address the concerns identified in your June 15, 2007 letter.

- 1) Concern: "At a recent meeting with FEMA (May 24, 2007), FEMA stated that the maps and information provided was not complete, and further changes would be made."

Response: At two meetings on February 20, 2007, and a meeting on March 21, 2007 in Stockton, FEMA presented levee information and requested feedback. At two follow-up meetings on May 24, 2007, in Stockton, FEMA presented updated levee status maps and levee status tables and stated that levee information would be updated again at the end of the 90-day PAL offer period to reflect actions taken by community officials and levee owners in response to the PAL offers.

- 2) Concern: *"FEMA has acknowledged that it has not completed its review of all the local levee documentation it had previously received, including information from Reclamation Districts RD 2042 and RD 17."*

Response: At the time of the second round of meetings on May 24, 2007, in Stockton, FEMA had reviewed most of the submitted material and had completed phone calls and coordination with several Reclamation Districts (RDs), including RD 2042 and RD 17, to discuss findings and additional information needed. This coordination was expected to be on-going during the 90-day PAL offer period as communities and levee owners provide additional data and determine what action(s) to take.

- 3) Concern: *"Reclamation Districts 404, 828 and 1614, in San Joaquin County, are listed as having deficiencies, however, at last contact had not yet received a letter from FEMA."*

Response: Representatives of Reclamation Districts 404, 828, and 1614 were copied on one or more of the PAL offer letters sent by FEMA on May 24, 2007. These recipients, which are listed at the bottom of the PAL letters, were identified using the Fall 2006 edition of the California Department of Water Resources (DWR) Directory of Flood Officials. Those copied on FEMA's May 24, 2007, letters include:

- Dante Nomellini, Attorney for RD 404, which was sent a copy of the PAL letter addressed to the General Manager of the CA Reclamation Board.
- Dante Nomellini, Attorney for RD 404; Richard Johnson, Attorney for RD 828; and Randell Norman, President of RD 1614, which were sent a copy of the PAL letter addressed to the Mayor of Stockton.
- Randell Norman, President of RD 1614, which was sent a copy of the PAL letter addressed to the Chairman of the Board of Supervisors of San Joaquin County.

FEMA can provide a copy of the PAL letters to additional RD representatives as needed.

- 4) Concern: *"It is vital that current information is used in making determinations regarding the acceptability of flood protection structures."*

Response: Based on coordination and agreements between FEMA and the U.S. Army Corps of Engineers (USACE), FEMA relies on information provided by USACE on the maintenance status and design capacity of levees that are in a USACE program. The USACE information may be supplemented by information provided by State or local officials, but it is important to note that FEMA's role is not to make determinations regarding the acceptability of flood risk reduction structures, such as levees. FEMA is creating a new, digital FIRM to accurately identify flood hazards so that wise flood insurance and floodplain management decisions can be made.

- 5) Concern: *"As local maintaining agencies, we have no control over encroachments."*

Response: The encroachment issue(s) for levees that are in a USACE program is a policy issue that must be resolved by USACE in coordination with local sponsors. As explained previously, FEMA relies on USACE for a determination on the adequacy of operations and maintenance for levees that are in a USACE program. Regardless, if an encroachment results in a levee system not meeting the criteria in 44 CFR 65.10, then the flood protection afforded by that levee system can not be recognized on a new Flood Insurance Rate Map (FIRM).

- 6) Concern: *"Needlessly preparing required action plans for many miles of levee-protected areas, which have no apparent deficiency, will be a tremendous waste of limited resources and detract from the ability to address bona fide levee integrity concerns."*

Response: This issue was discussed at length during the two meetings held in Stockton on May 24, 2007. At that time, a USACE representative stated that the levee owners who were granted the one year maintenance deficient correction period were asked to provide a maintenance correction plan to USACE within 90 days of USACE's March 30, 2007, notification letters. Further, if the levee owner can identify the sections that are maintenance deficient when they submit the correction plan, USACE can determine if they can hydraulically separate the deficient sections of the levee system. That may allow FEMA to identify individual sections of a levee system (in lieu of an entire levee system) that can not be accredited on an updated FIRM.

- 7) Concern: *"The State Reclamation Board was not present at the May 24, 2007, FEMA meeting, though their participation is vital relative to project levees, encroachments and PAL participation."*

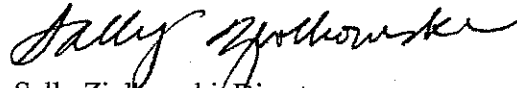
Response: The State Reclamation Board has been mailed copies of the PAL offer letters related to levees under their responsibility. In addition, the State Reclamation Board held a meeting in June that included CA DWR, USACE, and FEMA representatives. The FEMA PAL offers, Map Modernization, and related issues were discussed at this meeting.

FEMA is well aware that flood hazard conditions are constantly changing and uses a standardized mapping process to accommodate these changes during the development of a new FIRM. This includes the distribution of a preliminary (draft) FIRM for review and comment by community officials before the new FIRM is finalized. In addition, the Letter of Map Change (LOMC) process can be used at any time to update a FIRM. FEMA allows as many communities and levee owners as possible to take advantage of the PAL process, but it's important to note that the standard LOMC process continues to be an option regardless of whether the PAL option is employed.

Mr. T. R. Flinn
July 11, 2007
Page 4 of 4

We look forward to continuing to work with community officials and levee owners on the preparation of the new countywide FIRM for San Joaquin County. If you have additional questions, please contact Kathy Schaefer, Map Modernization Regional Engineer, of my staff, either by telephone at (510) 627-7129, or by facsimile at (510) 627-7147.

Sincerely,



Sally Ziolkowski, Director
Mitigation Division
FEMA Region IX

Enclosures:

- Map and table of San Joaquin County levees for which the PAL deadline is August 23, 2007
- Revised Procedure Memorandum No. 43 – Guidelines for Identifying Provisionally Accredited Levees, dated March 16, 2007

cc: Victor Mow, Chairman, San Joaquin County Board of Supervisors
Charles Kelly, San Joaquin County, Floodplain Administrator
Roger Churchwell, San Joaquin County Flood Control and Water Conservation
District, Senior Civil Engineer
James Giottonini, San Joaquin Area Flood Control Agency, Executive Director
Cristopher Neudeck, Reclamation District 17, Engineer
Dante John Nomellini, Reclamation District 17, Attorney
Randell D. Norman, Reclamation District 1614, President
Jay Punia, California Reclamation Board, General Manager
Ricardo Pineda, CA DWR, NFIP State Coordinator
Judy Soutiere, USACE, Sacramento District
Senator Feinstein State Office
Senator Boxer State Office
Representative McNerney District Office
Representative Cardoza District Office



FEMA

July 25, 2007

Mr. Reggie Hill, Manager
Lower San Joaquin Levee District
11704 West Henry Miller Avenue
Dos Palos, CA 93620

Dear Mr. Hill:


This letter is in regard to the Lower San Joaquin Levee District levees that are accredited on the effective Flood Insurance Rate Map (FIRM) and in the effective Flood Insurance Study (FIS) report for the unincorporated areas of Merced County. These levee segments are identified with ID#'s P214, P220, P225, P226, P240, P241, P243, P244, P245, P246, P248, P249, P250, P251, P252, P253, P254, P256, P257, P258, P261, P272, P278, P287, P299, P303, P304, P305, P314, P333 and P341 on an enclosure to this letter. As you may know, the Department of Homeland Security, Federal Emergency Management Agency (FEMA), is in the process of producing a countywide FIS report and FIRM for Merced County.

The flood hazard information presented on the effective FIRM and in the FIS report is based, in some areas, on flood protection provided by these levees. Based on the information available and on the mapping standards of the National Flood Insurance Program (NFIP) at the time that the FIS was performed, FEMA accredited the levees with providing protection from the flood that has a 1-percent-chance of being equaled or exceeded in any given year. This 1-percent-annual-chance flood is referred to as the base flood.

Based on coordination with the U.S. Army Corps of Engineers (USACE) and Merced County, it has been determined that these levees do not provide protection from the base flood. In accordance with the Code of Federal Regulations, Title 44, Section 65.10, FEMA (44CFR 65.10) will redesignate formerly protected areas as floodprone. Therefore, the mandatory flood insurance purchase requirements of the NFIP will apply to these areas when the countywide FIRM becomes effective.

Documentation can be submitted to FEMA through the Letter of Map Revision process for any levees that can be documented in the future as meeting the requirements of 44CFR 65.10. We will continue to work closely with community officials and levee owners to make residents aware of the current flood hazards they face, the availability of flood insurance and other ways to lower flood risk. If you have questions regarding flood mapping, please contact Eric Simmons, Map Modernization Regional Engineer, of my staff, by telephone at (510) 627-7029.

Sincerely,


Sally Zolkowski, Director
Mitigation Division
FEMA Region IX

Enclosures: Levee Status Map and Levee Status Table

cc: Mr. John Pedzoro, Merced County
Board of Supervisors, Chairman
Kellie Jacobs, Merced County,
Floodplain Administrator
Ricardo Pineda, CA DWR, NFIP State
Coordinator

Judy Soutiere, USACE, Sacramento District
Senator Feinstein State Office
Senator Boxer State Office
Representative Cardoza District Office

U.S. Department of Homeland Security
1111 Broadway, Suite 1200
Oakland, CA 94607-4052



FEMA

July 25, 2007

Mr. Wendel Trinkler, Jr., President
Reclamation District 2091
7007 Jennings Road
Modesto, CA 95358

Dear Mr. Trinkler:

This letter is in regard to a Reclamation District 2091 levee that is accredited on the effective Flood Insurance Rate Maps (FIRM) and in the effective Flood Insurance Study (FIS) report for the unincorporated area of Stanislaus County. This levee segment is identified with ID# P21 on an enclosure to this letter. As you may know, the Department of Homeland Security, Federal Emergency Management Agency (FEMA), is in the process of producing a countywide FIS report and FIRM for Stanislaus County.

The flood hazard information presented on the effective FIRM and in the FIS report is based, in some areas, on flood protection provided by this levee. Based on the information available and on the mapping standards of the National Flood Insurance Program (NFIP) at the time that the FIS were performed, FEMA accredited the levee with providing protection from the flood that has a 1-percent-chance of being equaled or exceeded in any given year. This 1-percent-annual-chance flood is referred to as the base flood.

Based on coordination with the U.S. Army Corps of Engineers (USACE) and Stanislaus County, it has been determined that this levee does not provide protection from the base flood. In accordance with the Code of Federal Regulations, Title 44, Section 65.10, FEMA (44CFR 65.10) will redesignate formerly protected areas as floodprone. Therefore, the mandatory flood insurance purchase requirements of the NFIP will apply to these areas when the countywide FIRM becomes effective.

Documentation can be submitted to FEMA through the Letter of Map Revision process for any levees that can be documented in the future as meeting the requirements of 44CFR 65.10. We will continue to work closely with community officials and levee owners to make residents aware of the current flood hazards they face, the availability of flood insurance and other ways to lower flood risk. If you have questions regarding flood mapping, please contact Eric Simmons, Map Modernization Regional Engineer, of my staff, by telephone at (510) 627-7029.

Sincerely,

A handwritten signature in cursive script that reads "Sally Ziolkowski".

Sally Ziolkowski, Director
Mitigation Division
FEMA Region IX

Enclosures: Levee Status Map and Levee Status Table

cc: William O'Brien, Stanislaus County
Board of Supervisors, Chairman
Tony Refuerzo, Stanislaus County,
Floodplain Administrator
Ricardo Pineda, CA DWR, NFIP State Coordinator
Judy Soutiere, USACE, Sacramento District
Senator Feinstein State Office

Senator Boxer State Office
Representative Cardoza District Office
Representative Radanovich District Office



FEMA

July 25, 2007

Mr. Joe Sallaberry, President
Reclamation District 2063
865 Geer Road
Turlock, CA 95380

Dear Mr. Sallaberry:

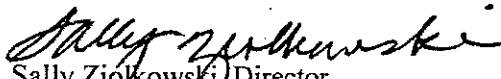
This letter is in regard to the Reclamation District 2063 levees that are accredited on the effective Flood Insurance Rate Map (FIRM) panels and in the effective Flood Insurance Study (FIS) reports for the unincorporated areas of Merced and Stanislaus Counties. These levee segments are identified with ID#'s P504, P505, P506 and P508 for Merced County and with ID#'s P22 and P23 for Stanislaus County on enclosures to this letter. As you may know, the Department of Homeland Security, Federal Emergency Management Agency (FEMA), is in the process of producing countywide FIS reports and FIRMs for Merced County and Stanislaus County.

The flood hazard information presented on the effective FIRMs and in the FIS reports is based, in some areas, on flood protection provided by these levees. Based on the information available and on the mapping standards of the National Flood Insurance Program (NFIP) at the time that the FISs were performed, FEMA accredited the levees with providing protection from the flood that has a 1-percent-chance of being equaled or exceeded in any given year. This 1-percent-annual-chance flood is referred to as the base flood.

Based on coordination with the U.S. Army Corps of Engineers (USACE) and Merced and Stanislaus Counties, it has been determined that these levees do not provide protection from the base flood. In accordance with the Code of Federal Regulations, Title 44, Section 65.10, FEMA (44CFR 65.10) will redesignate formerly protected areas as floodprone. Therefore, the mandatory flood insurance purchase requirements of the NFIP will apply to these areas when the countywide FIRM becomes effective.

Documentation can be submitted to FEMA through the Letter of Map Revision process for any levees that can be documented in the future as meeting the requirements of 44CFR 65.10. We will continue to work closely with community officials and levee owners to make residents aware of the current flood hazards they face, the availability of flood insurance and other ways to lower flood risk. If you have questions regarding flood mapping, please contact Eric Simmons, Map Modernization Regional Engineer, of my staff, by telephone at (510) 627-7029.

Sincerely,


Sally Ziolkowski, Director
Mitigation Division
FEMA Region IX

Enclosures: Levee Status Maps and Levee Status Tables

cc: John Pedzoro, Merced County Board of
Supervisors, Chairman
Kellie Jacobs, Merced County,
Floodplain Administrator
William O'Brien, Stanislaus County
Board of Supervisors, Chairman
Tony Refuerzo, Stanislaus County,
Floodplain Administrator

Michael Schmidt, Reclamation District 2063
Ricardo Pineda, CA DWR,
NFIP State Coordinator
Judy Soutiere, USACE, Sacramento District
Senator Feinstein State Office
Senator Boxer State Office
Representative Cardoza District Office
Representative Radanovich District Office

U.S. Department of Homeland Security
1111 Broadway, Suite 1200
Oakland, CA 94607-4052



FEMA

July 25, 2007

Mr. Robert W. Parris, Ph.D.
Reclamation District 2102
San Luis National Wildlife Refuge Complex
P.O. Box 2176
Los Banos, CA 93635

Dear Dr. Parris:

This letter is in regard to a Reclamation District 2102 levee that is accredited on the effective Flood Insurance Rate Map (FIRM) and in the effective Flood Insurance Study (FIS) report for the unincorporated areas of Stanislaus County. This levee segment is identified with ID# P19 on an enclosure to this letter. As you may know, the Department of Homeland Security, Federal Emergency Management Agency (FEMA), is in the process of producing a countywide FIS report and FIRM for Stanislaus County.

The flood hazard information presented on the effective FIRM and in the FIS report is based, in some areas, on flood protection provided by this levee. Based on the information available and on the mapping standards of the National Flood Insurance Program (NFIP) at the time that the FIS were performed, FEMA accredited the levee with providing protection from the flood that has a 1-percent-chance of being equaled or exceeded in any given year. This 1-percent-annual-chance flood is referred to as the base flood.

Based on coordination with the U.S. Army Corps of Engineers (USACE) Stanislaus County, it has been determined that this levee does not provide protection from the base flood. In accordance with the Code of Federal Regulations, Title 44, Section 65.10, FEMA (44CFR 65.10) will redesignate formerly protected areas as floodprone. Therefore, the mandatory flood insurance purchase requirements of the NFIP will apply to these areas when the countywide FIRM becomes effective.

Documentation can be submitted to FEMA through the Letter of Map Revision process for any levees that can be documented in the future as meeting the requirements of 44CFR 65.10. We will continue to work closely with community officials and levee owners to make residents aware of the current flood hazards they face, the availability of flood insurance and other ways to lower flood risk. If you have questions regarding flood mapping, please contact Eric Simmons, Map Modernization Regional Engineer, of my staff, by telephone at (510) 627-7029.

Sincerely,

A handwritten signature in cursive script, reading "Sally Ziolkowski".

Sally Ziolkowski, Director
Mitigation Division
FEMA Region IX

Enclosures: Levee Status Map and Levee Status Table

cc: William O'Brien, Stanislaus County
Board of Supervisors, Chairman
Tony Refuerzo, Stanislaus County
Floodplain Administrator
Ricardo Pineda, CA DWR,
NFIP State Coordinator

Judy Soutiere, USACE, Sacramento District
Senator Feinstein State Office
Senator Boxer State Office
Representative Cardoza District Office
Representative Radanovich District Office



FEMA

July 25, 2007

Mr. William Lyons, Jr., President
Reclamation District 2092
10561 Maze Boulevard
Modesto, CA 95358

Dear Mr. Lyons:

This letter is in regard to a Reclamation District 2092 levee that is accredited on the effective Flood Insurance Rate Map (FIRM) and in the effective Flood Insurance Study (FIS) report for the unincorporated areas of Stanislaus County. This levee segment is identified with ID# P20 on an enclosure to this letter. As you may know, the Department of Homeland Security, Federal Emergency Management Agency (FEMA), is in the process of producing a countywide FIS report and FIRM for Stanislaus County.

The flood hazard information presented on the effective FIRM and in the FIS report is based, in some areas, on flood protection provided by this levee. Based on the information available and on the mapping standards of the National Flood Insurance Program (NFIP) at the time that the FIS were performed, FEMA accredited the levee with providing protection from the flood that has a 1-percent-chance of being equaled or exceeded in any given year. This 1-percent-annual-chance flood is referred to as the base flood.

Based on coordination with the U.S. Army Corps of Engineers (USACE) Stanislaus County, it has been determined that this levee does not provide protection from the base flood. In accordance with the Code of Federal Regulations, Title 44, Section 65.10, FEMA (44CFR 65.10) will redesignate formerly protected areas as floodprone. Therefore, the mandatory flood insurance purchase requirements of the NFIP will apply to these areas when the countywide FIRM becomes effective.

Documentation can be submitted to FEMA through the Letter of Map Revision process for any levees that can be documented in the future as meeting the requirements of 44CFR 65.10. We will continue to work closely with community officials and levee owners to make residents aware of the current flood hazards they face, the availability of flood insurance and other ways to lower flood risk. If you have questions regarding flood mapping, please contact Eric Simmons, Map Modernization Regional Engineer, of my staff, by telephone at (510) 627-7029.

Sincerely,

A handwritten signature in cursive script, reading "Sally Ziolkowski".

Sally Ziolkowski, Director
Mitigation Division
FEMA Region IX

Enclosures: Levee Status Map and Levee Status Table

cc: William O'Brien, Stanislaus County
Board of Supervisors, Chairman
Tony Refuerzo, Stanislaus County,
Floodplain Administrator
Ricardo Pineda, CA DWR, NFIP State Coordinator
Judy Soutiere, USACE, Sacramento District
Senator Feinstein State Office

Senator Boxer State Office
Representative Cardoza District Office
Representative Radanovich District Office

U.S. Department of Homeland Security
1111 Broadway, Suite 1200
Oakland, CA 94607-4052



FEMA

July 25, 2007

Mr. William J. Lyons Jr., Director
Reclamation District 2031
10561 Maze Blvd.
Modesto, CA 95358

Dear Mr. Lyons:

This letter is in regard to the Reclamation District 2031 levees that are accredited on the effective Flood Insurance Rate Map (FIRM) and in the effective Flood Insurance Study (FIS) report for the unincorporated areas of Stanislaus County. These levee segments are identified with ID#'s P17 and P18 on an enclosure to this letter. As you may know, the Department of Homeland Security, Federal Emergency Management Agency (FEMA), is in the process of producing a countywide FIS report and FIRM for Stanislaus County.

The flood hazard information presented on the effective FIRM and in the FIS report is based, in some areas, on flood protection provided by these levees. Based on the information available and on the mapping standards of the National Flood Insurance Program (NFIP) at the time that the FIS were performed, FEMA accredited the levees with providing protection from the flood that has a 1-percent-chance of being equaled or exceeded in any given year. This 1-percent-annual-chance flood is referred to as the base flood.

Based on coordination with the U.S. Army Corps of Engineers (USACE) and Stanislaus County, it has been determined that these levees do not provide protection from the base flood. In accordance with the Code of Federal Regulations, Title 44, Section 65.10, FEMA (44CFR 65.10) will redesignate formerly protected areas as floodprone. Therefore, the mandatory flood insurance purchase requirements of the NFIP will apply to these areas when the countywide FIRM becomes effective.

Documentation can be submitted to FEMA through the Letter of Map Revision process for any levees that can be documented in the future as meeting the requirements of 44CFR 65.10. We will continue to work closely with community officials and levee owners to make residents aware of the current flood hazards they face, the availability of flood insurance and other ways to lower flood risk. If you have questions regarding flood mapping, please contact Eric Simmons, Map Modernization Regional Engineer, of my staff, by telephone at (510) 627-7029.

Sincerely,

A handwritten signature in cursive script that reads "Sally Ziolkowski".

Sally Ziolkowski, Director
Mitigation Division
FEMA Region IX

Enclosures: Levee Status Map and Levee Status Table

cc: William O'Brien, Stanislaus County
Board of Supervisors, Chairman
Tony Refuerzo, Stanislaus County,
Floodplain Administrator
Ricardo Pineda, CA DWR,
NFIP State Coordinator
Judy Soutiere, USACE, Sacramento District

Senator Feinstein State Office
Senator Boxer State Office
Representative Cardoza District Office
Representative Radanovich District Office



FEMA

July 25, 2007

Mr. Doug Dalton, Manager
Reclamation District 1602
2012 Apple Avenue
Patterson, CA 95363

Dear Mr. Dalton:

This letter is in regard to a Reclamation District 1602 levee that is accredited on the effective Flood Insurance Rate Map (FIRM) and in the effective Flood Insurance Study (FIS) report for the unincorporated areas of Stanislaus County. This levee segment is identified with ID# P24 on an enclosure to this letter. As you may know, the Department of Homeland Security, Federal Emergency Management Agency (FEMA), is in the process of producing a countywide FIS report and FIRM for Stanislaus County.

The flood hazard information presented on the effective FIRM and in the FIS report is based, in some areas, on flood protection provided by this levee. Based on the information available and on the mapping standards of the National Flood Insurance Program (NFIP) at the time that the FIS were performed, FEMA accredited the levee with providing protection from the flood that has a 1-percent-chance of being equaled or exceeded in any given year. This 1-percent-annual-chance flood is referred to as the base flood.

Based on coordination with the U.S. Army Corps of Engineers (USACE) and Stanislaus County, it has been determined that this levee does not provide protection from the base flood. In accordance with the Code of Federal Regulations, Title 44, Section 65.10, FEMA (44CFR 65.10) will redesignate formerly protected areas as floodprone. Therefore, the mandatory flood insurance purchase requirements of the NFIP will apply to these areas when the countywide FIRM becomes effective.

Documentation can be submitted to FEMA through the Letter of Map Revision process for any levees that can be documented in the future as meeting the requirements of 44CFR 65.10. We will continue to work closely with community officials and levee owners to make residents aware of the current flood hazards they face, the availability of flood insurance and other ways to lower flood risk. If you have questions regarding flood mapping, please contact Eric Simmons, Map Modernization Regional Engineer, of my staff, by telephone at (510) 627-7029.

Sincerely,

A handwritten signature in cursive script, reading "Sally Ziolkowski".

Sally Ziolkowski, Director
Mitigation Division
FEMA Region IX

Enclosures: Levee Status Map and Levee Status Table

cc: Tony Martinez, RD 1602
William O'Brien, Stanislaus County
Board of Supervisors, Chairman
Tony Refuerzo, Stanislaus County,
Floodplain Administrator
Ricardo Pineda, CA DWR,
NFIP State Coordinator

Judy Soutiere, USACE, Sacramento District
Senator Feinstein State Office
Senator Boxer State Office
Representative Cardoza District Office
Representative Radanovich District Office